



Anti-Corruption & Bribery - Policy -

I. Table of Content

| | |
|---|---|
| 1. Table of Content..... | 1 |
| 2. Rosy Blue Commitment | 2 |
| i. Our aim | 2 |
| ii. The Rosy Blue commitment to countering bribery and facilitation payments..... | 2 |
| iii. Scope | 3 |
| 3. Definitions of Bribery and Facilitation payments | 3 |
| i. What is bribery?..... | 3 |
| ii. What are facilitation payments?..... | 3 |
| iii. Issue Background | 4 |
| iv. Specific areas that pose the greatest risks from bribery..... | 4 |
| 4. Organization and responsibilities | 5 |
| 5. Business relationships | 5 |
| i. Subsidiaries and joint ventures..... | 6 |
| ii. Agents or brokers..... | 6 |
| iii. Contractors and suppliers..... | 6 |
| iv. Gifts..... | 6 |
| 6. Human Resources and Training | 7 |
| 7. Raising concerns and seeking guidance | 7 |
| 8. Communication | 7 |
| 9. Internal controls and annual audit..... | 7 |
| 10. Monitoring and review | 8 |

Sources

- www.unglobalcompact.org
- www.transparency.org
- www.weforum.org/en/initiatives/paci/index.htm
- www.iccwbo.org/policy/anticorruption/id870/index.html
- www.goodcorporation.com
- www.traceinternational.org
- www.globalreporting.org
- www.unodc.org/unodc/en/corruption/index.html
- www.oecd.org/dataoecd/56/36/1922428.pdf

Rosy Blue has a long history of conducting business responsibly and ethically. This has played a key role in helping us develop the global family business you see today. We must therefore continue to live up to the high ethical standards we have committed ourselves to and fully comply with all relevant laws and regulations wherever we operate.

*Since 2005 we are a founding member of the Responsible Jewellery Council¹. In June 2008, Rosy Blue signed the United Nations Global Compact, enhancing our commitment to promote the ten universally accepted principles covering human rights, labour standards, environmental protection and anticorruption * bribery.*

2. Rosy Blue Commitment

i. Our aim

The objective of this policy is to provide a framework for good business practices and to provide risk management strategies for countering bribery and to guide all our entities globally to:

- eliminate bribery
- demonstrate our commitment to countering bribery
- make a positive contribution to improving business standards of integrity, transparency and accountability wherever we operate.

Rosy Blue aims to have professional relationships with all its suppliers. Employees should therefore seek to maintain the highest standard of integrity in all business relationships, reject any business practice which might reasonably be deemed improper and foster the highest standards of industry behaviour. We would like to refer to the Business Principles for Countering Bribery published by Transparency International and Social Accountability International.

ii. The Rosy Blue commitment to countering bribery and facilitation payments

- Rosy Blue does not engage in any form of bribery or facilitation payments.
- Rosy Blue shall prohibit bribery in any form whether direct or indirect.
 1. Directly: Rosy Blue Does not engage itself in the bribery of public officials, political candidates, parties or party officials, nor of private individuals or private sector employees.

2. Indirectly: the use of intermediaries such as brokers, distributors, agents, consultants or other third parties for the purpose of committing acts of bribery is prohibited.
- Rosy Blue is committed to implementing a program to counter bribery and facilitation payments.
 - All directors, managers and employees of Rosy Blue shall at all times comply with the law and regulations.

iii. Scope

This policy applies to all Rosy Blue Alliance companies and employees.

3. Definitions of Bribery and Facilitation payments

i. What is bribery?

To offer, promise or give any payment, gift or other advantage, whether directly or through intermediaries, by any private or public corporation, or individual to any public official or elected representative as undue consideration for performing or refraining from the performance of that official's or representative's duties in connection with an international commercial transaction.

In plain language, bribes are paid to obtain something the bribe receiver would not otherwise have provided.

ii. What are facilitation payments?

Facilitation payments are paid to receive preferential treatment for something that the payment receiver is otherwise still required to do. It is a payment for "routine governmental action," such as providing normal government services.

iii. Issue Background

Two decades ago, bribes were a tax deductible business expense in many countries. In the early 1990s, nongovernment organisations began international campaigns against corruption. It became recognised that corruption hinders economic development, corrodes the fabric of society, and distorts national and international trade. Corruption can also undermine environmental and labour standards, access to human rights and the rule of law.

Bribery is the most widely condemned form of corruption. Today, nearly all countries have criminalised bribery where it occurs domestically. In many countries it can be prosecuted even where the offence takes place overseas. Bribes may take the form of cash, gifts in kind, hospitality, expenses, advantage or promises. In some cases, the briber holds a powerful role and controls the transaction. In other cases, a bribe may be effectively extracted from the person paying.

Facilitation payments have historically attracted a more mixed response. In countries where wages are low or gift-giving is intrinsic to relationships, facilitation payments emerged as more or less acceptable. However, making a clear distinction between a facilitation payment and a bribe can be difficult in practice. For this reason, facilitation payments are often treated as equal to bribes and prohibited in anti-corruption initiatives.

Businesses are increasingly taking a strong stand against corruption. Investor confidence and the reputations of some sectors have been eroded by business ethics scandals. Corruption is now understood to add a financial burden to business. There are estimates that 10% can be added to the costs of doing business in some parts of the world. A consensus is emerging that corruption and bribery damage company integrity, degrade the business environment and fail to create competitive advantage.

iv. Specific areas that pose the greatest risks from bribery

- Bribes

Rosy Blue prohibits the offer, gift, or acceptance of a bribe in any form, including kickbacks, on any portion of a contract payment, or the use of other routes or channels to provide improper benefits to customers, agents, contractors, suppliers or employees of any such party or government officials.

Rosy Blue prohibits an employee from arranging or accepting a bribe or kickback from customers, agents, contractors, suppliers, or employees of any such party or from government officials, for the employee's benefit or that of the employee's family, friends, associates or acquaintances.

- Political contributions

Rosy Blue's employees or agents should not make direct or indirect contributions to political parties, organizations or individuals engaged in politics, as a way of obtaining advantage in business transactions.

- Charitable contributions and sponsorships

Rosy Blue ensures that charitable contributions and sponsorships are not being used as a subterfuge for bribery. Our charitable contributions and sponsorships are justified by a legitimate charitable or cultural purpose. We disclose all its charitable contributions or sponsorships.

- Facilitation payments

Rosy Blue recognizes that facilitation payments are a form of bribery. Rosy Blue works to identify and eliminate them.

- Gifts, hospitality and expenses

Rosy Blue prohibits the offer or receipt of gifts, hospitality or expenses whenever such arrangements could affect the outcome of business transactions. (See Code of Conduct)

4. Organization and responsibilities

The Board of Directors of Rosy Blue provides leadership and commitment to the implementation of this program. The CEO of each entity is responsible for ensuring that the policy is carried out consistently with clear lines of authority.

The Global Compliance department works closely with local CSR-AML compliance officers and the senior management to demonstrate visible and active commitment to the implementation of this policy.

5. Business relationships

Rosy Blue applies this policy in its dealings with subsidiaries, joint venture partners, agents, contractors and other third parties with whom it has business relationships.

i. Subsidiaries and joint ventures

Rosy Blue will conduct due diligence before entering into a joint venture. Our company ensures that subsidiaries and joint ventures over which it maintains effective control, adopt this policy. Where our company does not have effective control, we will inform them on this policy and use our best efforts to monitor that the conduct of such subsidiaries and joint ventures are consistent with these business principles.

ii. Agents and brokers

Rosy Blue will not channel improper payments through an agent or broker. Compensation paid to agents or brokers should be appropriate and represent a justifiable remuneration for legitimate services rendered. The relationship should be documented. Rosy Blue will monitor the conduct of its agents and brokers and should have a right of termination in the event that the agent or broker is found to pay bribes.

Contractors and suppliers

Rosy Blue conducts its procurement practices in a fair and transparent manner. Rosy Blue undertakes due diligence in evaluating prospective contractors and suppliers to ensure that they have effective anti-bribery policies. Rosy Blue communicates its anti-bribery policies to contractors and suppliers. Our company monitors the conduct of contractors and suppliers and has a right of termination in the event that they are found to pay bribes.

iii. Gifts

Any gift or entertainment is always unacceptable if it:

- · is offered or made in exchange for a contract, a permit or any other specific benefit
- · is offered to obtain an improper advantage in the conduct of business
- · is in breach of local or international bribery laws
- · would, if it became public, adversely affect our reputation
- · may create a sense of obligation
- · may influence, or be perceived to influence, business judgement
- · may create, or appear to create, a conflict of interest.
- · is obtained through solicitation (i.e. employees requesting favours or gifts from suppliers or potential suppliers)

6. Human Resources and Training

This policy is part of the induction program for all new recruits. All employees receive updated training on the corporate social responsibility principles of Rosy Blue. This area is part of the training: the policy and the procedure are clearly explained in this training and all employees sign off for registration of this training. Our company makes it clear that no employee will suffer demotion penalty, or other adverse consequences for refusing to pay bribes even if it may result in the enterprise losing business.

7. Raising concerns and seeking guidance

All Rosy Blue employees should feel comfortable to raise concerns and report violations through our whistleblowing process or/and grievance mechanism in confidence and without risk of reprisal.

8. Communication

This policy is distributed to the Executive Management and all CSR officers globally. The local CSR officer should establish effective internal communication of this policy: Induction program-training program - policy folder. The entity should, on request, publicly disclose this policy.

9. Internal controls and annual audit

Off-the-books accounts and false or deceptive booking entries are strictly prohibited. All gifts, payments or any other contribution made and received under this policy, whether in cash or in kind, shall be documented and regularly reviewed, and properly accounted for on the books of the relevant Rosy Blue entity. Record retention and archival policy must be consistent with Rosy Blue accounting standards, tax and other applicable laws and regulations.

The global corporate affairs department checks regularly via the CSR site if the implementation of this policy is respected and asks feedback from the CSR local compliance officers to manage continuous improvement of this policy.

Rosy Blue entities are annually audited according to the national and international accounting standards (if applicable). The auditors will check the accounting and record keeping practices, and provide assurance that the entities are effective in countering bribery.

10. Monitoring and review

The CEO and The Executive Management of Rosy Blue, in coordination with the Global Compliance department and the AML Officer are responsible for monitoring this policy and periodically review the Program's suitability, adequacy and effectiveness and implement improvements as appropriate.

The Global compliance department sends a report to the Executive Management on an annual basis. This report contains the input and data of the local CSR compliance officers.

Version: 01.2026

Monitored by: Bhakti Chavan – AML Officer

Prepared by: Koen Boogaerts – Director Supply Chain

Reviewed by: Alexandra Uskokovic – Chief Operating Officer

Next Review: January 2027



