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BUSINESS ETHICS AND INTEGRITY

PURPOSE

IGCJD has systems in place to maintain awareness and ensure compliance with applicable laws. The purpose is to assure that the company policies on business ethics and integrity are effective and communicated to all relevant employees and stakeholders.

COMMITMENT AND IMPLEMENTATION

IGCJD's commitment to responsible business practices is endorsed by senior management. Policies and procedures are communicated to the employees and are publicly available.

VIOLATION AND PROCEDURE

Whenever IGCJD or any of its directors is involved in:

- any business-related activity that has resulted in a material conviction, or any material penalty imposed by a government, industry or other regulator;
- any activity that could have brought the diamond and jewelry industry or IGCJD into serious disrepute or could have damaged the consumer's perception of diamonds, jewelry, or the diamond and jewelry industry,

the BoD notifies the Compliance Officer immediately.

Whenever a manager within IGCJD encounters or suspects any of the following within IGCJD or with any of its customers, suppliers, subcontractors or other business associates:

- deviations from the IGCJD principles or policies in general
- fundamental differences in ethical, social and environmental policies and/or behavior
- behavior and actions which are not in line with the RJC COP 2019

this manager notifies the Director immediately.

From the moment the Compliance Officer receives any of the notifications listed above he/she starts to investigate the case without delay. Based on this investigation, the Compliance Officer will decide on the appropriate actions to be taken.

Written by	Reviewed by	Signature	Date
A. De Scheemaeker	A. De Scheemaeker		2024.01.31

REPORTING

Those actions might include, depending on the case:

- a documented report to be submitted to the BOD
- a documented report to be submitted to an extraordinary session of the BOD
- a report and an explanation endorsed by the BOD to the RJC committee

The BOD of IGCJD will decide upon the necessary corrective and/or preventive actions. The Compliance Officer will do the effective implementation of the decided actions. Reasonable time delays, in line with the severity of the case, will have to be respected throughout the procedure.