

PRIMESTAR



SUSTAINABILITY REPORT

2024



[primestardiamonds.com](https://www.primestardiamonds.com)

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INTRODUCTION

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- 3** GOOD HEALTH AND WELL-BEING 
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- 8** DECENT WORK AND ECONOMIC GROWTH 
- 17** PARTNERSHIPS FOR THE GOALS 

ABOUT OUR REPORT

GRI 2-1 TO 2-4, ESRs 1, ESRs 2



Organizational Details (GRI 2-1)

We, Primestar (referred to herein as 'Primestar', 'Primestar BV', 'the Company', 'we,' 'our,' or 'us'), are pleased to present our Annual Sustainability Report, demonstrating our unwavering commitment to Environmental, Social, and Governance (ESG) principles. As a responsible diamond company, we strive to integrate sustainability into our core operations, ensuring ethical business practices and responsible sourcing. This report reflects our dedication to sustainable growth and transparency in our ESG journey, guided by our theme, "Prime in Purpose, Star in Sustainability."

This report follows Global Reporting Initiative Standards (GRI) (GRI 1: Foundation 2021, GRI 2: General Disclosures 2021, GRI 3: Material Topics 2021) and the Corporate Sustainability Reporting Directive (CSRD) aligned European Sustainability Reporting Standards (ESRS) disclosures. These include general, governance, and sector-specific standards relevant to our industry. Our practices also align with frameworks such as the United Nations Sustainable Development Group (UN SDGs), Science Based Target Initiatives (SBTi), Women Empowerment Principles (WEPs), Responsible Jewellery Council (RJC), and Watch and Jewellery Initiative (WJI).

Entities Included in the Organization's Sustainability Reporting (GRI 2-1, 2-2)

The scope of this report encompasses our business activities in polished diamond distribution. As a business-to-business (B2B) enterprise, we focus on providing ethically and responsibly sourced natural diamonds to our global clientele. Our sustainability approach covers our operational headquarters and business engagements, ensuring full compliance with responsible sourcing and supply chain transparency standards.

Reporting Period, Frequency and Contact Point (GRI 2-3)

The information, initiatives, and performance indicators presented in this report cover the Calendar year 2024, from January 1, 2024, to December 31, 2024.

For further details or inquiries regarding this report, please contact us at:

Primestar

www.primestardiamonds.com

info@primestardiamonds.com

Restatements of Information (GRI 2-4)

As this is our inaugural Sustainability Report, there are no restatements of previous information. Any future restatements will be transparently disclosed in subsequent reports.

Forward-Looking Statement

This report includes forward-looking statements regarding Primestar's future sustainability initiatives, goals, and business developments. These statements are based on current assumptions and subject to various risks and uncertainties. Actual outcomes may differ due to changes in market conditions, regulatory developments, or other external factors. Readers are advised to consider these uncertainties when interpreting forward-looking information.



MESSAGE FROM OUR CO-FOUNDER

GRI 2-22



About this report



Introduction



Governance



Environmental



Social



Annexures

“

Primestar is a leading family-run diamond company, offering bespoke diamond solutions and upholding exceptional standards in governance and ethics.

”

At Primestar, our journey has always been about more than diamonds—it’s about crafting brilliance with responsibility. As a family-led enterprise, we’ve remained committed to offering precisely manufactured natural diamonds that uphold the highest ethical standards.

This year’s theme, “Prime in Purpose, Star in Sustainability,” reflects how deeply we integrate Environmental, Social, and Governance (ESG) values into every layer of our operations. We believe that a diamond’s true value lies not just in its clarity and cut, but in how ethically and sustainably it is brought into the world.

In 2024, we made significant strides—strengthening supply chain transparency, embracing globally recognized frameworks like the Responsible Jewellery Council (RJC), the UN Sustainable Development Goals (UNSDGs), and the Women’s Empowerment Principles (WEPs), and reinforcing our ethical sourcing practices. Our impact is driven not just by compliance, but by purpose. From supporting miners and empowering women to fostering conscious trade practices, we embed sustainability into our business DNA. Yet our work is far from over. In a rapidly evolving landscape, we remain unwavering in our pursuit of excellence—not just in the products we offer, but in the values we uphold. With innovation, collaboration, and a deep sense of purpose, we aim to set new benchmarks in sustainable luxury.

I invite you to explore this report as a reflection of our commitment—to integrity, transparency, and the enduring brilliance of responsible business.

Mrs. Priti Parikh
Co-Founder, Primestar



MESSAGE FROM OUR CO-FOUNDER



About this report



Introduction



Governance



Environmental



Social



Annexures



We trade in the world's most enduring treasures - and we're committed to ensuring that our impact is just as lasting. At Primestar, sustainability drives us forward, inspiring every decision we make today for a better tomorrow.



When my wife Priti and I moved to Antwerp in the early 1990s, we set out to build more than just a diamond business—we set out to build a legacy rooted in trust, integrity, and excellence. Our vision was clear from the beginning: to craft a brand that reflects the values we hold close, and to offer diamonds that tell a story far beyond their sparkle.

From the outset, we believed that the true brilliance of a diamond lies not just in its beauty, but in its journey. This belief guides our zero-tolerance policy on conflict diamonds, our unwavering adherence to the Kimberley Process, and our rigorous sourcing protocols. Every diamond we supply stands as a testament to our ethical commitment.

At Primestar, sustainability is not an option—it is a responsibility we proudly embrace. Whether it's reducing our carbon footprint, implementing cutting-edge traceability systems, or verifying the authenticity of each gem through innovative controls, we are continuously evolving to ensure every step we take aligns with our purpose.

Equally important is our commitment to the communities intertwined with our supply chain. From championing ethical mining practices to advocating fair labor and social equity, we strive to make a meaningful and lasting impact that extends far beyond the stones we offer. As we look to the future, we remain dedicated to redefining the standards of diamond sourcing—seamlessly blending luxury with ethics, and innovation with responsibility. We believe that true value is measured not only in brilliance, but in purpose.

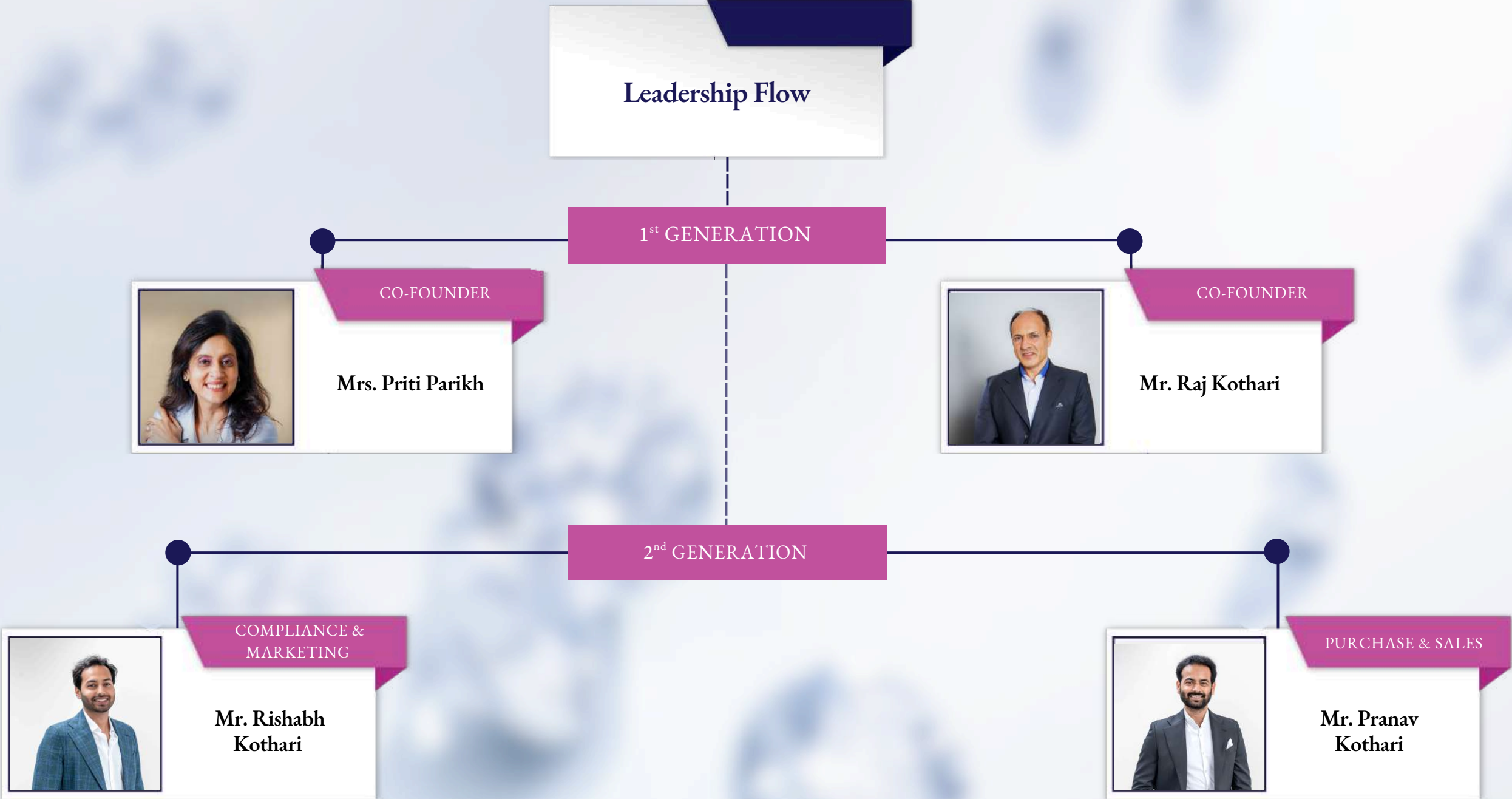
Thank you for your continued trust in Primestar. We are honored to be part of your story.

Raj Kothari
Co-Founder, Primestar



ABOUT OUR COMPANY

GRI 2-9, ESRS 2 GOV-1



OUR GLOBAL FOOTPRINT

Primestar operates with a global mindset, ensuring ethical sourcing, transparency, and sustainability across all our locations. Our commitment extends beyond business, fostering responsible practices that support people and the planet.



12
TOTAL TEAM
STRENGTH



33%
GENDER
DIVERSITY



100%
CONFLICT FREE
DIAMONDS



10+
YEARS OF
EXCELLENCE

Global Reach	Operations
	Surat Manufacturing Facility-Custom-Cut Diamonds and Round Brilliant
	Dubai Office- Specialised Preparation Unit
	Antwerp HQ-Stock, Final QC, Preparation Sales to Customer

MISSION, VISION & PHILOSOPHY



MISSION

To be the preferred partner to luxury brands for ethically sourced, high-quality diamond solutions. We are dedicated to facilitating diamond procurement through the most transparent and sustainable frameworks, building long-term relationships, and fortifying confidence with every customer.



VISION

To lead the diamond industry as a trusted partner to luxury brands, providing optimized diamond supply, information, and transparency. We are committed to maintaining the highest standards of quality, integrity, and sustainability in all our operations.

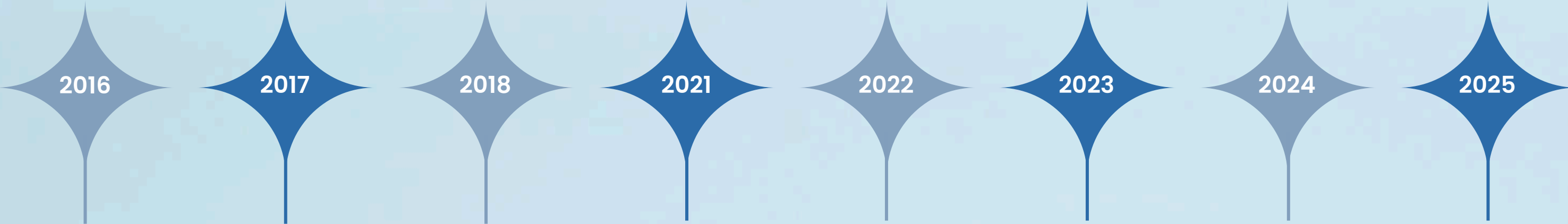


PHILOSOPHY

We believe that every diamond should come with the promise of beauty and sustainability. Our philosophy is rooted in transparency and honesty throughout the diamond supply chain. We ensure that each diamond we supply is fully traceable and ethically sourced, respecting human rights, environmental sustainability, and social governance.



OUR JOURNEY SO FAR



2016
Raj Kothari and Priti Parikh set up a diamond distribution business, Primestar in Antwerp, Belgium.

2017
Primestar achieves Responsible Jewellery Council (RJC) certification.

2018
Second-generation, Pranav Kothari and Rishabh Kothari, assume day-to-day business operations and responsibilities.

2021
Implemented ERP system with internal traceability feature.

2022
Primestar enforces a zero-tolerance policy for Russian rough diamonds within its supply chain.

2023
Primestar partners with iTraceiT traceability solution to trace the flow of its diamonds.

2024
Primestar adopted IFRS accounting standards, joined Original luxury, World Diamond Council, Watch & Jewellery Initiative and partnered with AWDC for FACETS 2024.

2025
(Upcoming) Primestar is on track for SBTi carbon reduction commitment, achieved RJC re-certification, upgraded its in-house manufacturing, adopted WEPs for gender equity and is preparing to join the UN Global Compact (UNGC).



OUR CORE VALUES

At Primestar, our values are the foundation of our business, shaping the way we operate and reinforcing our reputation as a trusted partner to prestigious watch and jewellery brands worldwide. These principles guide our commitment to excellence, ethical sourcing, and sustainability.



INTEGRITY AND HONESTY

We build relationships on trust, transparent communication, and unwavering reliability.



ACCOUNTABILITY

We take full responsibility for delivering personalized solutions with precision, ensuring timely fulfilment of commitments.



TRUST AND TRANSPARENCY

We maintain open communication and transparent reporting, fostering trust across our entire supply chain.



SUSTAINABILITY

We actively assess and improve our impact, driving shared success through responsible and sustainable business practices.



INNOVATION

We embrace change and technology, offering our stakeholders innovative, up-to-date solutions.



SUSTAINABILITY

We actively assess and improve our impact, driving shared success through responsible and sustainable business practices.



SUSTAINABILITY DASHBOARD 2024



30%	50%	100%
Reduction in energy consumption	low-carbon logistics coverage	Diamonds responsibly sourced
50%	SBTI	05 tons
Suppliers assessed for environmental impact	aligned Scope 3 reduction commitment	of waste diverted from landfills
100%		
Sustainable packaging solutions implemented		



33%	100%	100%
of workforce are women	Employees trained on ethical sourcing	Supplier audits for labor standards
100%	100%	100%
Employee wellness participation	Suppliers adhere to fair labor practices.	Inclusive hiring practices



05	100%	100%
Average annual training hours per employee:	Suppliers follow Code of Conduct	Board oversight on sustainability
100%	50%	100%
Leadership is evaluated on ESG criteria	Suppliers evaluated for ESG performance	ESG integrated in strategy
100%		
Compliance with sourcing norms		

COMMITMENT TO UN SDGS



Contributions to the Sustainable Development Goals

SDG	CONTRIBUTIONS
	<p>We believe in creating a safe and healthy work environment for everyone involved in our supply chain. Our goal is to support the well-being of employees and communities through strict health protocols, mental wellness programs, and access to healthcare services. We also ensure that our partners adhere to the highest safety and ethical standards throughout diamond cutting and mining processes.</p>
	<p>As a woman-led business, Primestar champions gender equality in an industry traditionally dominated by men. Mrs Priti Kothari's leadership serves as an inspiration for women in the diamond trade. We are committed to empowering women across all levels of our business, promoting equal opportunities, and fostering an inclusive and supportive work environment.</p>
	<p>We strive to provide dignified and fair employment opportunities within Primestar and throughout our value chain. Our operations ensure decent wages, safe working conditions, and respect for human rights. We support sustainable economic growth by partnering with ethical miners, investing in employee development, and utilizing technologies that enhance efficiency and transparency in diamond sourcing and sales.</p>
	<p>Collaboration is key to driving lasting change. We work closely with industry stakeholders, local communities, and international organizations to advance sustainability within the diamond industry. As a proud participant in the Watch & Jewellery Initiative 2030 (WJI 2030), we align our efforts with global sustainability goals and industry-wide commitments. By forging strong partnerships with ethical sourcing platforms and sustainability-focused alliances, we contribute to collective efforts that uphold ethical practices, reduce environmental impacts, and promote fair trade. Strengthen collaborations with global sustainability initiatives, industry stakeholders, and ethical organizations to drive collective progress. Our membership in the Watch & Jewellery Initiative 2030 (WJI 2030) reflects our commitment to transformative change through joint action, transparency.</p>

COMMITMENT TO UN SDGS

SDG Commitments: Our Pledge Towards Sustainability

SDG	CONTRIBUTIONS
	<p>Enhance diamond traceability, reduce waste, and integrate sustainable packaging and logistics into operations.</p>
	<p>Parhway for commitment to the Science-Based Targets initiative (SBTi) to reduce our carbon footprint and adopt low-impact transportation & energy efficiency strategies.</p>
	<p>Maintain a zero-tolerance policy on conflict diamonds, comply with the Kimberley Process, and uphold strong ethical standards in sourcing.</p>



MEMBERSHIPS & COLLABORATIONS: UNITED FOR A RESPONSIBLE FUTURE

GRI 2-28



RESPONSIBLE JEWELLERY COUNCIL (RJC) & POLICY ALIGNMENT



WORLD DIAMOND COUNCIL (WDC)



ANTWERP WORLD DIAMOND CENTRE (AWDC)



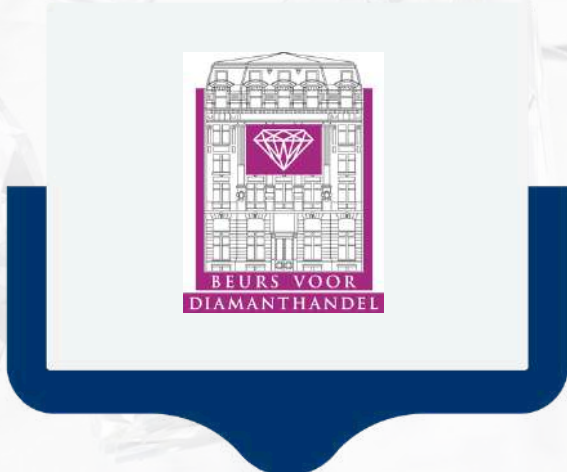
ITRACEIT: TRANSPARENCY THROUGH TECHNOLOGY



WATCH & JEWELLERY INITIATIVE (WJI 2030)



FACETS 2024



BEURS VOOR DIAMANTHANDEL



SCIENCES BASED INITIATIVE TARGETS (UPCOMING - 2025)



◆ DOUBLE
MATERIALITY

02

DOUBLE MATERIALITY ASSESSMENT & STAKEHOLDER ENGAGEMENT

GRI 3-1, GRI 3-2, GRI 3-3, ESRS 1

Introduction

Primestar applies Double Materiality to assess sustainability issues from two perspectives: financial impact on the company and broader social & environmental impact. This approach aligns with global frameworks like GRI, CSRD, ESRS, and ISSB, ensuring resilience, regulatory compliance, and stakeholder trust. While Primestar does not directly engage in mining, upstream sourcing is a critical area of environmental and social impact. Our materiality assessment included ESG issues linked to upstream activities—such as biodiversity loss, water and land use, labor rights, and traceability. These topics were prioritized based on supplier risks and sector-specific relevance, reinforcing our focus on responsible sourcing throughout the diamond value chain.

Impact Materiality:

Impact materiality evaluates how Primestar’s operations influence society and the environment, despite not engaging in mining. Key aspects include:

Human Rights & Labor Practices: Ensuring fair wages, labor rights, and conflict-free sourcing.

Environmental Responsibility: Encouraging suppliers to reduce water, energy use, and carbon footprint in diamond processing.

Governance & Ethical Trade: Strengthening AML policies, anti-corruption measures, and blockchain traceability to prevent illicit trade.

Approach to Double Materiality

Financial Materiality:

Financial materiality assesses how ESG factors affect Primestar’s business performance, risks, and growth. Key focus areas include:

Regulatory Compliance: Adhering to Kimberley Process, RJC standards, and AML laws to avoid penalties and ensure responsible trade.

Reputation & Market Competitiveness: Ethical sourcing and traceability boost investor confidence and customer trust. Operational & Supply Chain Risks – Climate change, geopolitical issues, and supplier compliance impact business stability.

Operational & Supply Chain Risks: Climate change, geopolitical issues, and supplier compliance impact business stability.



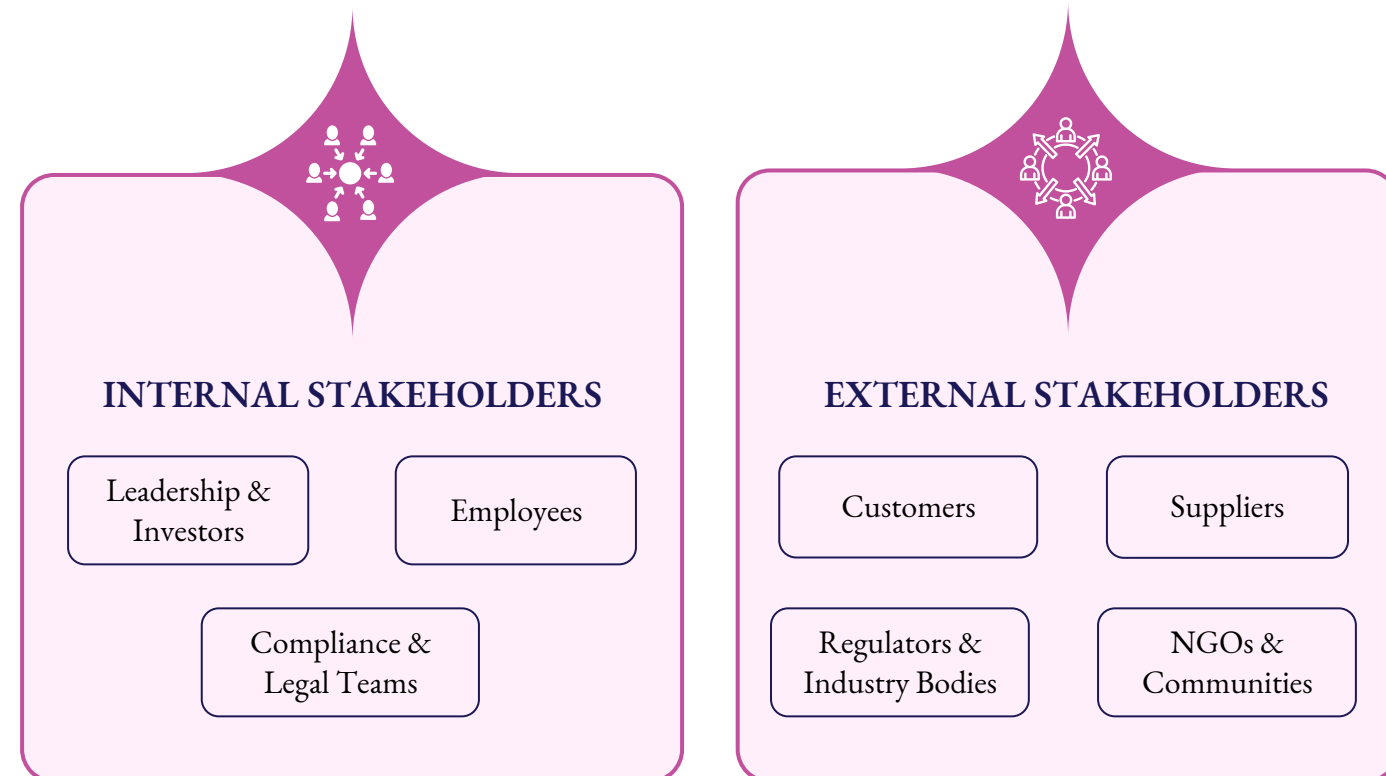
DOUBLE MATERIALITY ASSESSMENT & STAKEHOLDER ENGAGEMENT

GRI 3-1, GRI 3-2, GRI 3-3, ESRS 1

Stakeholder Engagement

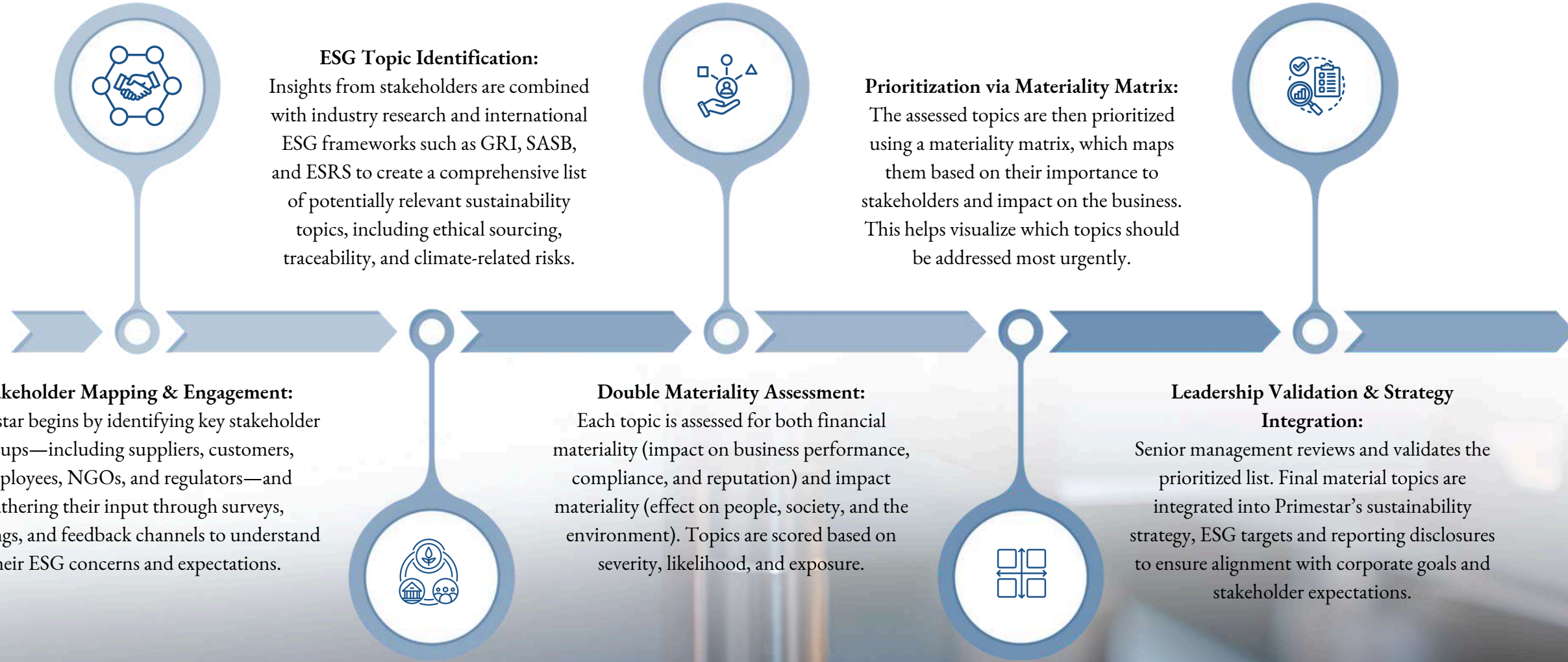
At Primestar, stakeholder engagement is central to our sustainability strategy. We follow a structured process-starting with stakeholder mapping, followed by tailored engagement based on influence and impact. Using surveys, interviews, workshops, and audits, we engage internal and external groups regularly to gather insights that shape our materiality assessment and ESG risk framework.

These findings are integrated into business decisions and reported transparently to leadership. This continuous dialogue builds trust and ensures alignment with global frameworks like WJI 2030, RJC standards, and the UN SDGs.



Stakeholder	Type of Engagement	Relevant Material Topics
Investors & Leadership	ESG reporting, Annual General Meetings (AGMs), sustainability briefings	Ethical sourcing, Anti-money laundering (AML), Regulatory compliance
Employees	Internal surveys, ESG awareness programs, training workshops	Workplace ethics, Fair wages & labor practices, Data security
Compliance & Legal Teams	Compliance audits, Policy reviews, Risk assessments	AML compliance, Business ethics, Trade regulations
Customers	Transparency reports, Responsible sourcing disclosures, Consumer feedback	Ethical sourcing, Blockchain traceability, Responsible purchasing
Suppliers	Supplier ESG audits, Due diligence assessments, Code of Conduct agreements	Supplier due diligence, Labor rights, Climate risks
Regulators & Industry Bodies	Certifications (RJC, WJI, Kimberley Process), Compliance reporting	Regulatory compliance, Trade laws, Anti-corruption
NGOs & Communities	Collaborative projects, Impact assessments, Public consultations	Human rights, Environmental impact of mining, Climate change

DOUBLE MATERIALITY ASSESSMENT METHODOLOGY:



Stakeholder Mapping & Engagement:
 Primestar begins by identifying key stakeholder groups—including suppliers, customers, employees, NGOs, and regulators—and gathering their input through surveys, meetings, and feedback channels to understand their ESG concerns and expectations.

ESG Topic Identification:
 Insights from stakeholders are combined with industry research and international ESG frameworks such as GRI, SASB, and ESRS to create a comprehensive list of potentially relevant sustainability topics, including ethical sourcing, traceability, and climate-related risks.

Double Materiality Assessment:
 Each topic is assessed for both financial materiality (impact on business performance, compliance, and reputation) and impact materiality (effect on people, society, and the environment). Topics are scored based on severity, likelihood, and exposure.

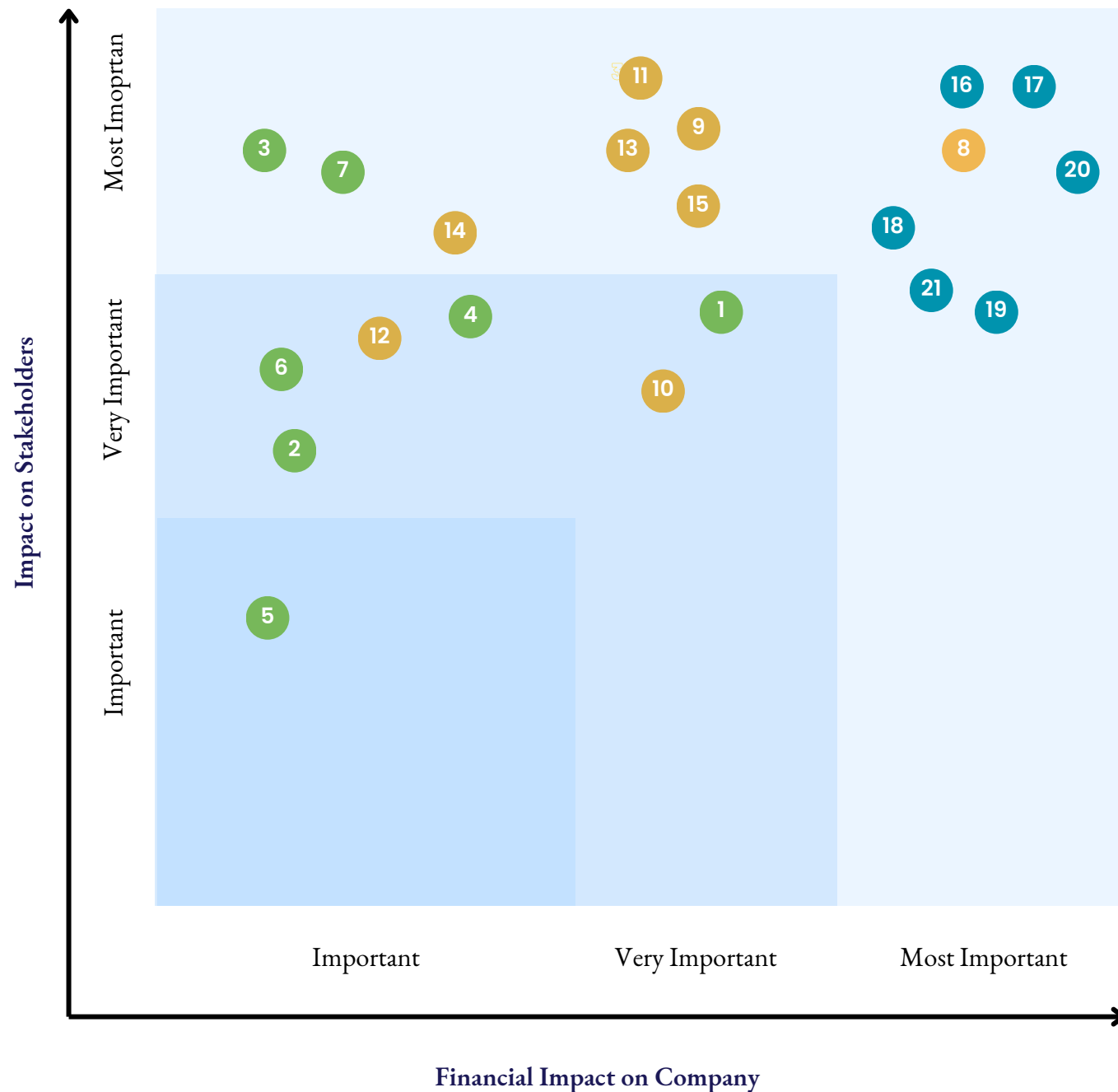
Prioritization via Materiality Matrix:
 The assessed topics are then prioritized using a materiality matrix, which maps them based on their importance to stakeholders and impact on the business. This helps visualize which topics should be addressed most urgently.

Leadership Validation & Strategy Integration:
 Senior management reviews and validates the prioritized list. Final material topics are integrated into Primestar’s sustainability strategy, ESG targets and reporting disclosures to ensure alignment with corporate goals and stakeholder expectations.

DOUBLE MATERIALITY ASSESSMENT & STAKEHOLDER ENGAGEMENT

Materiality Matrix:

The table below highlights the key material topics and their dual impact:



ENVIRONMENTAL	GOVERNANCE
1. Carbon Footprint of Diamond Logistics & Trading	16. Traceability & Blockchain for Responsible Sourcing
2. Climate Risks & Resilience in Supply Chain	17. Anti-Corruption & Anti-Money Laundering (AML) Compliance
3. Environmental Impact of Diamond Mining (Upstream Impact)	18. Regulatory Compliance & International Trade Laws
4. Water & Energy Use in Diamond Processing (Upstream Impact)	19. Supplier Due Diligence & Risk Assessment
5. Sustainable Packaging & Waste Reduction	20. Business Ethics & Responsible Trading Practices
6. Waste Management from Office/Showroom Operations	21. Data Security & Confidentiality in Trading Transactions
7. Biodiversity & Land Use (if partnering near sensitive regions)	
SOCIAL	
8. Ethical Sourcing & Human Rights in Supply Chain	
9. Fair Wages & Labor Practices in Supply Chain	
10. Consumer Awareness & Responsible Purchasing	
11. Worker Health & Safety in Diamond Cutting/Polishing (if sourced from partner facilities)	
12. Diversity, Equity & Inclusion (DEI) in Corporate Team	
13. Local Community Engagement & Development (in sourcing regions)	
14. Customer Health & Product Safety (e.g., secure settings, non-toxic treatments)	
15. Grievance Mechanism & Worker Voice (supply chain)	

WHY TO CHOOSE US?

At Primestar, we are committed to ethical, responsible, and sustainable diamond supply. Our values are embedded in every aspect of our operations, ensuring trust, transparency, and long-term value for our stakeholders.

Ethical Sourcing & Responsible Trade

We prioritize sourcing diamonds from suppliers who adhere to the responsible mining operation, highest ethical standards, ensuring compliance with the Kimberley Process Certification Scheme (KPCS) and other international regulations. Our commitment to responsible sourcing guarantees that our diamonds are conflict-free and procured with integrity.

Environmental Stewardship

As a responsible diamond company, we recognize the environmental impact of the upstream supply chain. We collaborate with suppliers who implement sustainable mining practices and strive to reduce the carbon footprint associated with diamond manufacturing. Our dedication to sustainability extends to responsible logistics, packaging, and energy-efficient operations.

Transparency & Traceability

We uphold transparency as a core value, ensuring that our diamonds are fully traceable from source to market. By leveraging industry best practices and digital solutions, we provide clients with detailed provenance information, reinforcing confidence in our ethical and sustainable trade practices.

Commitment to Stakeholder Engagement

We actively engage with key stakeholders, including customers, suppliers, investors, and industry regulators, to align our sustainability strategies with global best practices. Our continuous dialogue with industry bodies and commitment to responsible trading strengthens trust and collaboration across the supply chain.

Social Responsibility & Community Impact

Primestar believes in giving back to the communities involved in the diamond trade. Through partnerships and initiatives, we support local development, fair labor practices, and ethical working conditions in the supply chain. Our unwavering commitment to sustainability, ethics, and transparency makes us the preferred choice for responsible diamond trading. At Primestar, we illuminate the future of the industry with integrity and sustainability at the core of our business.

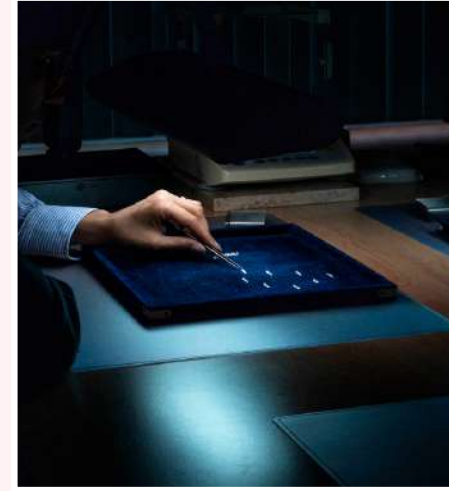
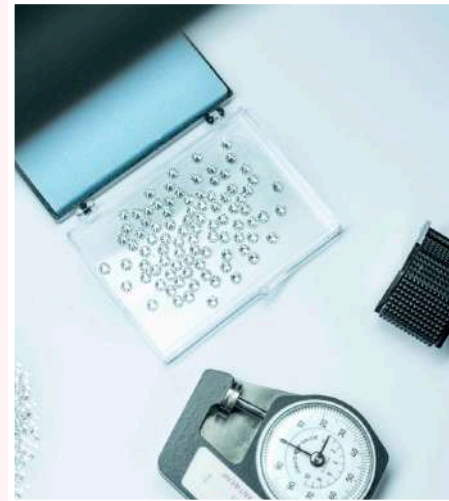


PRODUCTS AND INTEGRITY

Category	Sustainability Highlights	Key Features	Ideal For
 <p data-bbox="131 859 722 938">Small Diamonds (< 4.30mm)</p>	<ul style="list-style-type: none"> Ethically sourced from conflict-free zones Compliant with the Kimberley Process & RJC Standards Optimized for minimal waste in cutting 	<ul style="list-style-type: none"> Round Brilliant & Fancy Shapes Perfectly calibrated (0.55 – 4.20mm) Color: D – H, Clarity: FL – VS2 	<p>High-end watch & jewelry brands demanding precision-cut, ethically sourced melee diamonds</p>
 <p data-bbox="131 1299 722 1377">Custom-Cut Diamonds</p>	<ul style="list-style-type: none"> Reduces waste through precision cutting Tailored to maximize yield from rough diamonds Partnering with sustainable mines for sourcing 	<ul style="list-style-type: none"> Bespoke cuts & proprietary shapes Tailored to maximize brilliance & uniqueness Available in all sizes, D-H color, FL-VVS clarity 	<p>Luxury designers & brands seeking distinctive, sustainable diamond creations</p>
 <p data-bbox="131 1738 722 1813">Certified Diamonds & Fancy Colors</p>	<ul style="list-style-type: none"> GIA & HRD Certified for ethical sourcing Supports responsible mining practices Traceable origins for transparency 	<ul style="list-style-type: none"> Wide range of high-quality, lab-certified stones Fancy Intense, Fancy Vivid, and Classic Whites 0.25 – 5.00ct+ sizes, GIA & HRD certified 	<p>Fine jewelry houses, collectors & bespoke creations</p>

OUR SERVICES: BEYOND BRILLIANCE

At Primestar, we don't just trade diamonds—we craft a journey of excellence, transparency, and sustainability. Every service we offer is designed to enhance quality, ensure ethical sourcing, and contribute to a more sustainable diamond industry.



Natural Diamond Guarantee

- 100% natural, conflict-free diamonds, verified through rigorous screening.
- Multiple checkpoints ensure responsible sourcing and authenticity.
- Certified by the International Gemological Institute for ethical integrity.

Authenticity and responsibility go hand in hand

Secured Sustainable Packaging & Customized Solutions

- Tailor-made, eco-friendly packaging for seamless integration into jewelry & watches.
- Minimal-waste packaging and tamper proof seal bags.
- Ready-to-set assortments, reducing excess inventory & waste.

Confidence in every delivery.

Fine-Tuned Assortments & Responsible Grading

- Standardized grading with ethical assurance tailored to client needs.
- In-house records ensure consistency.
- Reducing waste with precisely sorted diamonds for efficient manufacturing.
- Client based strategic shelf stock.

Excellence begins with ethical precision.

Blockchain-Enabled Traceability & Transparency

- Integrated iTraceit blockchain solution for full diamond provenance.
- Verified details on origin, mining source & ethical compliance.
- Enables responsible consumer choices with complete transparency.

A traceable diamond is a trustworthy diamond.

Advanced Manufacturing & Sustainable Operations

- High-tech Surat facility ensures low-impact precision cutting.
- Reducing carbon footprint through energy-efficient processes.
- Just-in-time delivery to minimize excess inventory & waste.

Sustainability is not a choice—it's our commitment.

SUPPLY CHAIN





GOVERNANCE

03

SDG'S ALIGNED

- 9** INDUSTRY, INNOVATION AND INFRASTRUCTURE 
- 16** PEACE, JUSTICE AND STRONG INSTITUTIONS 
- 17** PARTNERSHIPS FOR THE GOALS 

CORPORATE GOVERNANCE

GRI 2-9 TO 2-18

Our Governance Structure

Board Composition (GRI 2-9, 2-10, 2-11)

Our leadership team comprises seasoned professionals with extensive experience in the diamond industry:

	<p>MRS. PRITI PARIKH</p> <p>Co-founder and HRD-certified gemologist, emphasizing sustainability and ethical practices.</p>		<p>MR. RAJ KOTHARI</p> <p>Co-founder with decades of expertise in manufacturing and supplying diamonds to luxury brands.</p>
	<p>MR. PRANAV KOTHARI</p> <p>Next-generation leaders integrating cutting-edge technology and transparency into business practices.</p>		<p>MR. RISHABH KOTHARI</p> <p>Future-ready leaders are embedding advanced technology and transparency at the core of modern business practices.</p>

Oversight of ESG & Ethical Sourcing (GRI 2-12, 2-13)

Our board actively oversees Environmental, Social, and Governance (ESG) matters, ensuring:

- Ethical Sourcing** : Adherence to the Kimberley Process and Responsible Jewellery Council (RJC) guidelines.
- Supply Chain Transparency** : Tracking goods through unique lot identifiers using advanced ERP systems.
- Regulatory Compliance**: Ensuring alignment with anti-money laundering (AML) regulations.

Sustainability Leadership (GRI 2-14)

The board integrates sustainability into our core strategy by:

- Conducting Annual ESG Reviews to assess performance.
- Engaging with stakeholders to promote responsible trading.

Ethical Business Practices & Risk Management (GRI 2-15, 2-16, 2-17, 2-18)

Conflict of Interest Policy (GRI 2-15)



Primestar ensures business integrity through a structured Conflict of Interest Policy, which applies to all directors, officers, and employees:

- Identification & Disclosure: Any potential conflict must be reported to the Ethics Committee.
- Evaluation: The committee assesses the situation to ensure impartial decision-making.
- Resolution: Corrective actions are taken to mitigate risks.

Potential Conflicts Include:

- Business transactions involving a Responsible Person or their Family Member with a Material Financial Interest.
- Outside engagements where a Responsible Person serves in a competing business.

- Acceptance of gifts, entertainment, or favors that may influence decision-making, except for items of nominal value.

Critical Concerns & Reporting Mechanism (GRI 2-16)



We have a structured three-step reporting mechanism to handle concerns:

- Reporting: Confidential reporting channels for employees and stakeholders.
- Investigation: Governance & Compliance Team conducts thorough assessments.
- Resolution: Findings are addressed with corrective measures.

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CORPORATE GOVERNANCE

GRI 2-9, 2-10, 2-11, 2-12, 2-13, 2-14

Policy Commitments & Responsible Trading (GRI 2-22, 2-23, 2-24, 2-25, 2-26)

Sustainability Commitment Statement (GRI 2-22)



At Primestar, ethical governance is reinforced through active oversight, structured accountability, and transparent communication channels.

Critical Concerns Escalation Protocol

- We maintain open lines of communication to ensure that critical ESG concerns—whether related to sourcing, labor, or ethics—are escalated to the highest governance body without delay. Employees and stakeholders can report through confidential channels, with every concern tracked, reviewed, and resolved transparently.

Collective ESG Expertise at Board Level

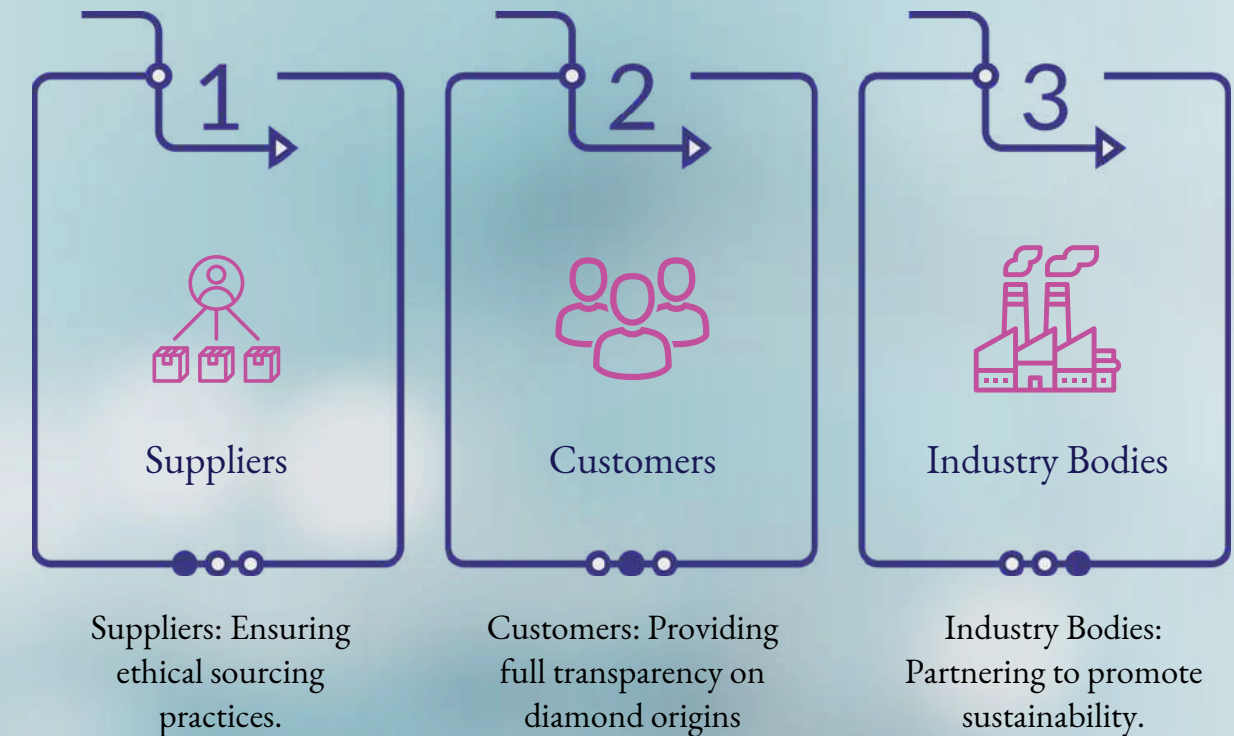
- Our highest governance body undergoes continuous upskilling on ESG trends, risks, and regulatory changes. Regular workshops, compliance updates, and scenario analysis sessions ensure they remain equipped to steer Primestar’s sustainability strategy with foresight and competence.

Commitment to Legal and Ethical Compliance

- We uphold zero tolerance for regulatory breaches. Our internal audit and legal teams collaborate with leadership to ensure full compliance with applicable laws across all jurisdictions. Any instances of non-compliance are addressed swiftly, and corrective actions are logged and disclosed in our governance reviews.

Stakeholder Engagement (GRI 2-29, 2-30)

Stakeholder Engagement Approach (GRI 2-29)



Collective Bargaining & Workforce Relations (GRI 2-30)

Primestar promotes fair labour rights and open communication to ensure an ethical and inclusive workplace. We respect the right to freedom of association and collective bargaining, allowing employees to join unions and negotiate working conditions without fear. Currently, 100% of our employees are covered by collective bargaining agreements, reflecting our commitment to transparent and responsible labour practices.

Performance (GRI 2-19, 2-20, 2-21)

Annual Governance Performance Review (GRI 2-18, 2-19)

- Board Effectiveness Review: Evaluating leadership and ESG integration.
- Stakeholder Feedback Integration: Refining governance based on input.

Remuneration Policies & Transparency (GRI 2-20, 2-21)

- Performance-Based Compensation – Aligning rewards with ESG goals.
- Annual Disclosure – Transparent reporting on executive remuneration.

ETHICAL PRACTICES

GRI 2-23 TO 2-29, ESRS G1, G2

At Primestar, we uphold the highest ethical standards in every facet of our business, ensuring transparency, accountability, and responsibility in diamond trading. Our ethical practices reflect our commitment to fair trade, human rights, compliance with laws, and responsible business conduct, reinforcing our sustainability theme: Prime in Purpose, Star in Sustainability.

Fair Trade and Responsible Business Conduct (GRI 2-23, 2-24, 2-25)

We adhere to globally recognized ethical business standards, ensuring integrity in all transactions:

- Zero tolerance for corruption – Maintaining transparency and accountability in all business dealings.
- Ethical sourcing – Only partnering with suppliers who adhere to the highest ethical and sustainability standards.
- Blockchain-based traceability – Implementing advanced ERP systems with iTraceit blockchain solutions to track the origin of every diamond.
- Commitment to continuous improvement – Strengthening ethical business practices through innovation and compliance.

Supply Chain Due Diligence (GRI 2-27, 2-29)

A responsible supply chain is essential to our ethical commitment. Our due diligence framework includes:

- Blockchain Integration – Using iTraceit blockchain solutions to track and verify diamond provenance.

- Supplier Screening – Ensuring all partners comply with international ethical standards.
- Full Traceability & Transparency – Verifying diamond origins from mine to market.
- Continuous Monitoring – Regular supplier assessments to uphold responsible sourcing and on-site audits for key manufacturing partners.

Anti-Money Laundering and Financing of Terrorism (GRI 2-27)

At Primestar, we uphold a zero-tolerance approach toward money laundering and the financing of terrorism. Our AML Policy ensures compliance with global regulations and industry best practices, safeguarding the integrity of our financial transactions.

Key Measures::

- AML Compliance Officer – Overseeing implementation and adherence to AML/CFT protocols.
- Know-Your-Customer (KYC) & Know-Your-Supplier (KYS) – Verifying identities and ensuring transparency in business relationships.

Anti-Money Laundering and Financing of Terrorism (GRI 2-27)

At Primestar, we maintain a zero-tolerance policy toward child labour and all forms of forced or compulsory labour. Aligned with ILO Conventions and national laws, our Human Rights Policy ensures ethical labour practices across operations and the supply chain. We go beyond prohibition by actively implementing and monitoring preventive measures to protect vulnerable groups.

Key Measures:

- Age Verification – Rigorous checks during hiring to prevent child labour.
- Supplier Audits – Contracts require compliance with labour laws; regular monitoring in place.
- Training & Awareness – Ongoing training for staff and suppliers on ethical labour practices.
- Enforcement – Non-compliant suppliers are subject to review and possible contract termination.

Compliance with Laws and Industry Standards (GRI 2-27, 2-28)

Primestar upholds the highest legal and industry standards:

- Kimberley Process Certification Scheme: Eliminating conflict diamonds.
- OECD Due Diligence Guidance: Ensuring responsible mineral sourcing.
- Corporate Social Responsibility (CSR): Operating responsibly to benefit society and the environment.

Whistleblowing and Grievance Mechanisms (GRI 2-26)

Primestar is committed to ethical business conduct and transparency. Our Complaint and Grievance Policy ensures all stakeholder concerns are addressed confidentially, with options for anonymous reporting and strong non-retaliation protections in place. This includes incidents related to violence and harassment.

Complaint Handling Process

- Complaints can be submitted anonymously or with identity, with acknowledgment sent within 2 working days.
- Each case is investigated confidentially by a designated manager, with a response within 5 working days.
- For complex cases, complainants are kept informed; legal advice is sought when needed.

- Resolutions are approved by senior management and used to improve policies and practices.
- Resolutions are documented, approved by a senior manager, and used to improve company processes.

Oversight and Reporting

- The Managing Director oversees this policy, ensuring proper training and compliance.
- Complaints are reviewed at the Managing Director level to identify trends and improve procedures.
- The Complaint and Grievance Procedure is publicly accessible via Primestar’s website.

Responsible Trading and Human Rights (GRI 2-23, 2-25, 2-27)

We Commit To:

- UN Universal Declaration of Human Rights: Ensuring employees are aware of their fundamental rights.
- ILO Conventions Compliance: Upholding global labor standards, including:
 - No Child and Forced Labor : Zero tolerance in all operations.
 - Freedom of Association: Supporting collective bargaining rights.
 - Diversity & Inclusion: Equal opportunities in hiring and workplace practices.
 - Fair Compensation & Work Conditions: Compliance with Belgian labor laws.
 - Health & Safety: Prioritizing safe and ethical workplaces.
- Ethical Sourcing Standards: Ensuring all our diamond supply chain respects human rights, environmental sustainability, and social governance.
- Ethical Sourcing Standards: Ensuring all our diamond supply chain respects human rights, environmental sustainability, and social governance.

ETHICAL PRACTICES

GRI 2-23 TO 2-29, ESRS G1, G2

- Commitment to Sustainability: Minimizing greenhouse gas emissions and supporting global climate action.
- Compliance with International Human Rights Standards: Aligning operations with globally recognized human rights principles.

Ethical Marketing and Customer Communication (GRI 2-29)



We engage with customers based on trust and transparency:

- Clear Diamond Provenance: Providing verifiable sourcing details.
- Honest Advertising: Avoiding misleading sustainability claims.
- Customer Education Initiatives: Raising awareness on ethical diamond sourcing.
- Sustainability Storytelling: Showcasing responsible sourcing journeys.

Data Retention Policy: Ethical Practices (GRI 2-23, 2-27, 418-1)

Primestar ensures responsible data management by retaining only necessary data for defined periods. Compliance with GDPR, Responsible Jewellery Council (RJC) standards, and industry regulations is upheld through structured data classification, secure storage, and controlled access.

Key retention periods:

- 10 years: Critical records (diamond certificates, diamond naturality screening report, HR, financial reports, audits, BPP/PI-related documents).
- 5 years: Important internal documents (meeting minutes, policies, short-term contracts).
- 1 year: Non-essential records (emails, internal notes).

Customer Data Privacy (GRI 2-27)

We prioritize customer trust by implementing robust data security measures:

Key Data Protection Measures:

- Strict Compliance with Data Protection Laws: Adhering to GDPR and global privacy regulations.
- Encryption & Cybersecurity: Protecting sensitive financial and personal information.
- Ethical Data Use: Ensuring responsible collection, storage, and processing.
- Transparent Privacy Policies: Clearly communicating data management practices.



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At Primestar, ethics illuminate every facet of our global journey.



OUR POLICIES

GRI 2-23, ESRS 2 G2

At Primestar, our policies ensure ethical excellence, regulatory compliance, and sustainable business practices.

These policies are designed to uphold transparency, protect stakeholder interests, and foster a culture of accountability throughout our operations. From preventing financial misconduct and ensuring data privacy to safeguarding human rights and promoting responsible sourcing, each policy reinforces our dedication to operating with integrity across all areas of governance.



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Responsible Business Policies



Anti-Money Laundering (AML)

- Compliance with global AML regulations
- Strict monitoring of financial transactions
- Risk-based due diligence on all partners



Complaint & Grievance

- Confidential and transparent reporting channels
- Fair and timely resolution process
- Protection against retaliation



Conflict of Interest

- Disclosure of potential conflicts in business dealings
- Guidelines for ethical decision-making
- Preventing undue influence in operations



Data Retention

- Secure storage and handling of sensitive data
- Compliance with international data protection laws
- Defined retention and disposal timelines



Human Rights

- Confidential and transparent reporting channels
- Fair and timely resolution process
- Protection against retaliation



Environment

- Promote sustainable practices by minimizing waste and reducing carbon footprint
- Comply with environmental regulations and use resources efficiently
- Engage employees in supporting eco-friendly initiatives through training and awareness



Supply Chain

- Ethical sourcing and supplier due diligence
- Compliance with the Kimberly Process and RJC standards
- Regular audits and risk assessments for responsible sourcing



Kimberley Process

- Trade only in conflict-free diamonds
- Keep certified records and conduct audits
- Train staff and reject non-compliant suppliers



Product Integrity

- Ensure full disclosure and traceability of all diamonds
- Prohibit misrepresentation and unfair practices
- Maintain strict testing and classification standards

OUR SUPPLY CHAIN

GRI – 204-1, 301-1, 308-1, 408, 409, 414-1, 419-1, ESRS S2, ESRS E1 & E5

Responsible sourcing

At Primestar, responsible sourcing is more than a policy—it’s a promise. Every diamond we supply carries a story of integrity, ethical practices, and unwavering commitment to transparency. As we say, "A diamond’s true brilliance lies in its journey—a journey of responsibility, integrity, and sustainability. At Primestar, we don’t just supply diamonds; we empower trust, values, and a vision for a more ethical industry."

Our Sourcing Commitment

- Ethically Sourced, Responsibly Traded: We ensure that every diamond in our portfolio meets the highest ethical standards, reinforcing our dedication to fair trade and sustainability.
- Verified Origins : We provide complete provenance details for every diamond, ensuring customers can trace their diamonds back to responsible sources.
- Strong Supplier Partnerships: Our sourcing network is built on long-term trust, compliance, and audits with industry-leading ethical standards.

Provenance & Transparency

Your peace of mind matters. That’s why we prioritize full traceability.

- Source Verification: Every diamond we trade undergoes stringent checks to confirm adherence to the Kimberley Process and Responsible Jewellery Council (RJC) guidelines.
- Transparency at Every Step: We share detailed provenance information, giving customers

confidence in the ethical journey of their diamonds.

- Sustainable Sourcing Practices: We work only with suppliers committed to responsible mining and manufacturing standards, ensuring minimal environmental and social impact.

Conflict-Free Assurance

- Kimberley Process Certified: Every diamond in our collection is certified conflict-free under the globally recognized Kimberley Process Certification Scheme.
- Strict Ethical Compliance: We follow industry best practices, ensuring our diamonds never contribute to unethical practices or conflicts.
- Beyond Compliance: While regulations set the foundation, we go a step further by fostering partnerships with ethical suppliers and advocating for continued improvements in diamond sourcing.

Continuous Improvement & Future Commitment

- Ongoing Monitoring & Audits : We conduct regular internal and external evaluations of our supply chain to ensure compliance with evolving sustainability and ethical standards.
- Stakeholder Engagement : We engage with industry leaders, customers, and advocacy groups to promote transparency and responsible sourcing initiatives.
- A Pledge for the Future : Our commitment doesn’t stop here. We continuously seek ways to enhance our responsible sourcing practices, ensuring Primestar remains a leader in ethical diamond supply.



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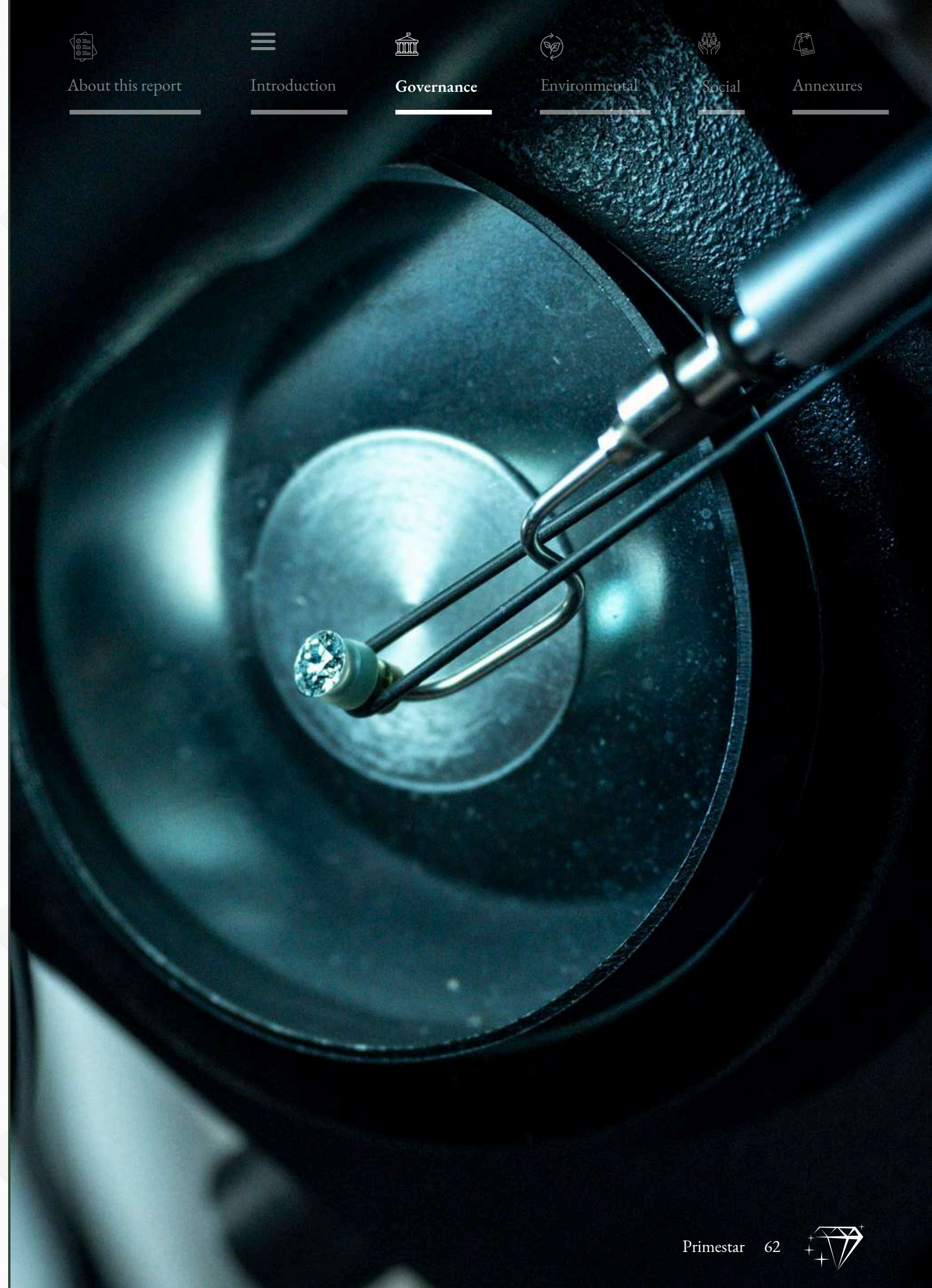
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OUR COMMITMENT TO TRACEABILITY

GRI 2-6, GRI 308, GRI 414, ESRS S2 & G1



Ensuring traceability in the diamond trade is more than a compliance requirement—it’s a responsibility we uphold with dedication. Our approach is built on three key pillars:

Year	Key Initiative	Objective	Impact on Traceability
2021	Adoption of iTraceit	Integrate third-party traceability technology	Established digital tracking for sourcing
2023	Blockchain Implementation	Secure data integrity & prevent tampering	Created an immutable ledger for tracking
2024	Real-time Supply Chain Monitoring and segregation through unique lot numbers for all diamonds	Increase transparency at every stage and digitize process flow	Enhanced visibility from mine to market

Ethically Sourced Origins (GRI 2-6, GRI 308, GRI 414-1)

Our diamonds originate from reputable mining companies that adhere to highest ethical standards. Some of these sources include:

Mining Company	Mine Location	Ethical Standards Ensured
Rio Tinto	Canada (Diavik Mine)	Adheres to the Responsible Jewellery Council (RJC) Code of Practices
Burgundy	Canada (Ekati Mine)	Complies with international ethical sourcing protocols
De Beers	Botswana, Canada, Namibia, South Africa	Implements Best Practice Principles (BPP) for ethical mining
Petra Diamonds	South Africa, Tanzania	Committed to the Kimberley Process and responsible mining through community and environmental stewardship
Okavango Diamond Company	Botswana	Wholly owned by the Government of Botswana; committed to transparent, ethical sourcing and beneficiation of local communities

By sourcing from responsible mining operations, we ensure that every diamond meets our strict ethical criteria before entering our trading pipeline.

Our Modes of Diamond Traceability (GRI 308-2, GRI 414-2)

We integrate iTraceit, an independent third-party traceability solution, into our custom ERP system. This digital tracking system records each diamond’s journey, ensuring full supply chain integrity at every stage:

- **iTraceit-Powered Digital Tracking:** Primestar integrates iTraceit, a trusted third-party traceability solution, with its advanced ERP system to ensure a secure, diamond journey.
- **Mine-to-Market Tracking:** Each diamond receives a unique digital footprint that records its transformation from input to output, ensuring complete traceability.
- **Blockchain-Backed Security:** Every diamond’s journey is stored in an immutable blockchain ledger, providing indisputable proof of origin, ethical compliance, and supply chain integrity.
- **Real-Time Transparency :** With real-time tracking, every stage—from sourcing to cutting and polishing—is meticulously recorded, offering complete visibility for stakeholders and customers.

OUR COMMITMENT TO TRACEABILITY


GRI 2-6, GRI 308, GRI 414, ESRS S2 & G1

- **Seamless Digital Integration:** Our ERP system works in sync with iTraceit, ensuring automated, tamper-proof documentation that supports responsible sourcing and ethical trading.
- **Certified Provenance Reports:** Our diamonds come with a detailed provenance report, certifying its ethical sourcing, adherence to international standards, and verified authenticity.

Compliance & Certification

We uphold the highest international standards in diamond traceability and ethical sourcing, including:

Kimberley Process Certification Scheme :



Ensures all diamonds are conflict-free.

Watch & Jewellery Initiative 2030



Advances traceability and industry sustainability

Responsible Jewellery Council (RJC) Compliance



Aligns with industry best practices for responsible sourcing.

By maintaining these certifications and continually auditing our supply chain, we guarantee that our diamonds contribute to a fair and conflict-free industry.

Customer Confidence & Transparency

We believe that customers deserve complete confidence in their diamond's journey. That's why we provide:

- **Provenance Reports:** Each diamond comes with a detailed record of its sourcing.
- **Verified Origin Certificates:** Customers can trace their diamonds back to their mining source, ensuring full transparency.
- **Sustainability Assurance:** Our traceability efforts ensure minimal environmental and social impact, supporting responsible mining communities worldwide.



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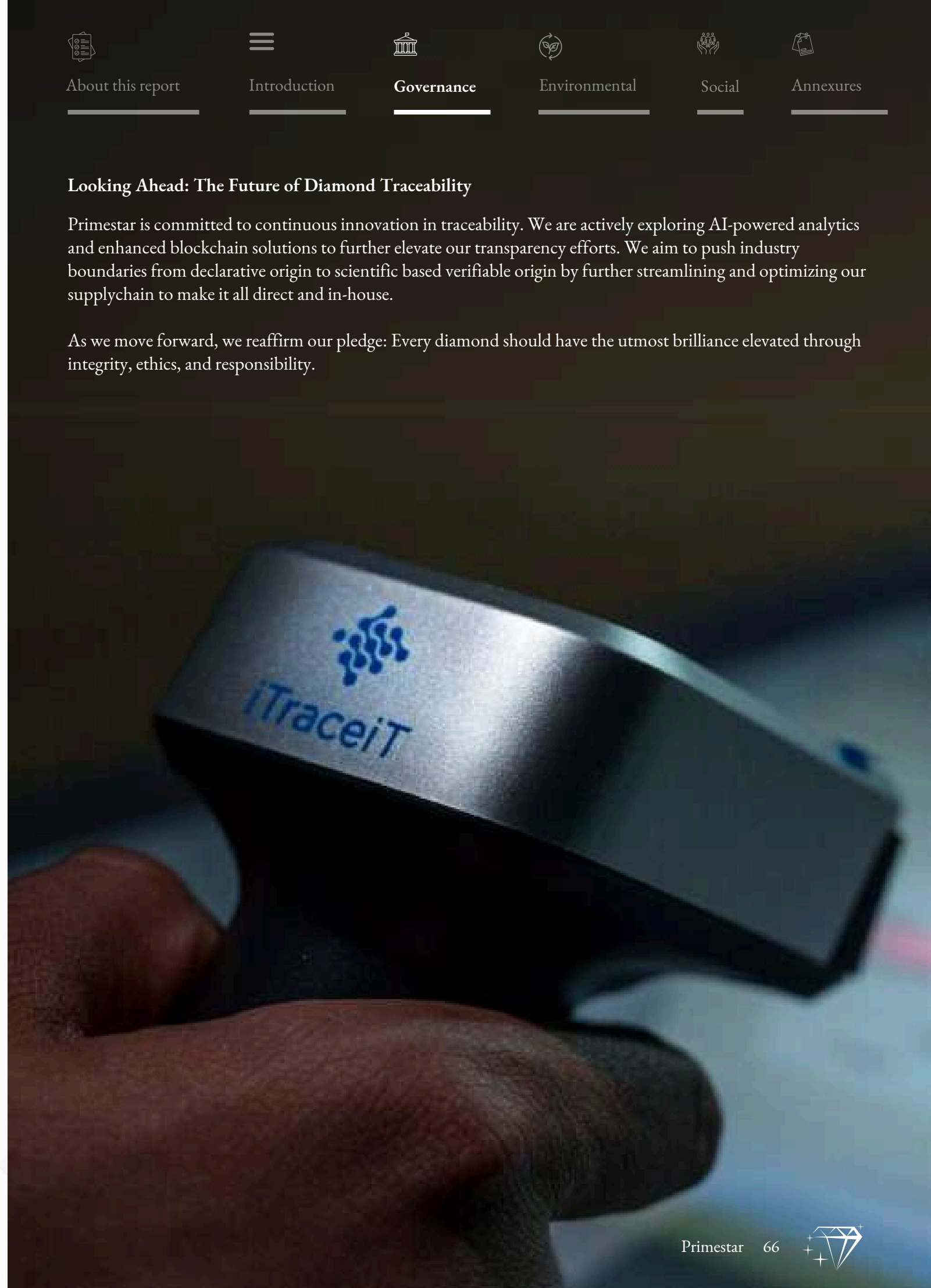


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Looking Ahead: The Future of Diamond Traceability

Primestar is committed to continuous innovation in traceability. We are actively exploring AI-powered analytics and enhanced blockchain solutions to further elevate our transparency efforts. We aim to push industry boundaries from declarative origin to scientific based verifiable origin by further streamlining and optimizing our supplychain to make it all direct and in-house.

As we move forward, we reaffirm our pledge: Every diamond should have the utmost brilliance elevated through integrity, ethics, and responsibility.





ENVIRONMENTAL

04



SDG'S ALIGNED

- 6** CLEAN WATER AND SANITATION 
- 7** AFFORDABLE AND CLEAN ENERGY 
- 11** SUSTAINABLE CITIES AND COMMUNITIES 
- 12** RESPONSIBLE CONSUMPTION AND PRODUCTION 
- 13** CLIMATE ACTION 

ENVIRONMENTAL STEWARDSHIP

ESRS E1, ESRS E2, ESRS E3, ESRS E4, ESRS E5

Carbon Neutrality

(GRI – 204-1, 302-1, 302-2, 305-1, 305-2, 305-3, 305-4, 305-5, 308-1)

At Primestar, sustainability is not just a commitment—it is a core business imperative. As a global diamond company, we understand that the impact of climate change extends beyond direct emissions. Our role in the supply chain presents a unique opportunity to drive meaningful change by engaging with responsible suppliers, optimizing logistics, and integrating energy-efficient practices into our operations.

As a proud signatory of the Science Based Targets initiative (SBTi) and we align our sustainability efforts with globally recognized climate action frameworks. This commitment translates into measurable targets, a clear decarbonization roadmap, and continuous engagement with industry stakeholders to advance collective climate action.

Scope 3 Emissions Focus:



As a global diamond company, Primestar’s largest carbon impact lies in Scope 3 emissions particularly from transportation, cutting and polishing processes, and mining operations. We actively track and manage these emissions across our full value chain using carbon accounting tools and supplier data.

To reduce our Scope 3 footprint, we are:

- Partnering with low-carbon logistics providers
- Engaging suppliers that use energy-efficient, sustainable manufacturing
- Integrating digital traceability to monitor emissions
- Aligning procurement with climate standards like SBTi

These efforts ensure we minimize environmental impact beyond our direct operations, in line with the 1.5°C trajectory of the Paris Agreement and our broader sustainability goals.

Sustainable Procurement Strategy:



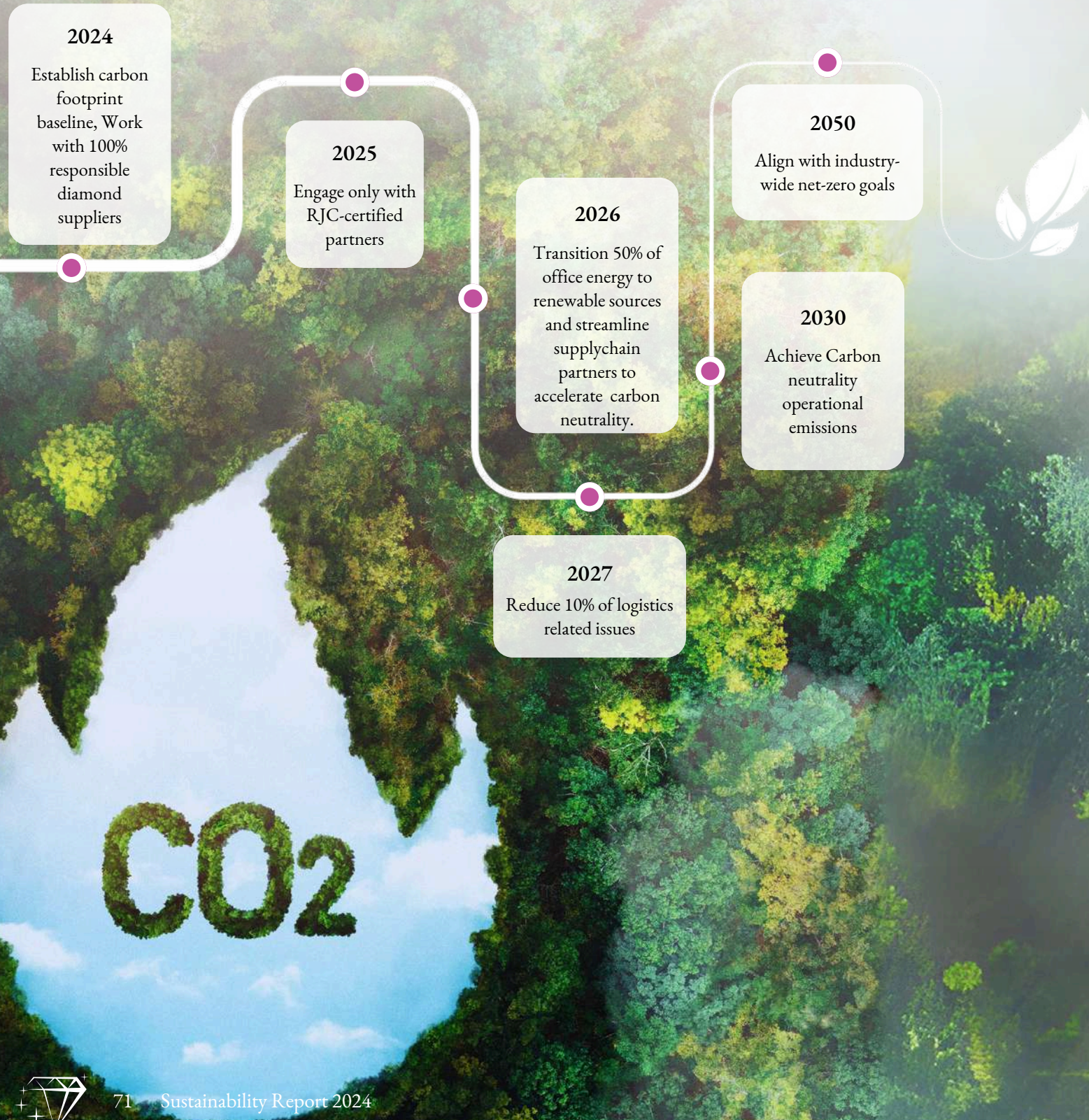
Sustainable sourcing is central to Primestar’s commitment to ethical and climate-responsible trade. Our procurement strategy prioritizes partnerships with diamond manufacturers who adopt environmentally and socially responsible practices across the value chain.

We ensure that all procurement decisions are guided by ESG criteria, focusing on:

- Energy-efficient and low-carbon cutting and polishing methods
- Responsible water and waste management at supplier sites
- Traceability of origin through blockchain and digital tracking tools
- Elimination of conflict minerals and alignment with the Kimberly Process
- Compliance with RJC and WJI 2030 sustainability frameworks

We regularly audit our suppliers, provide capacity-building support, and include sustainability clauses in contracts.

OUR ROADMAP TO CARBON NEUTRAL



To translate our commitment into action, we have established a structured decarbonization strategy, with short-term and long-term milestones:

Target Year	Key Commitment	Impact Focus	Expected Outcome
2024	Establish carbon footprint baseline and work with 100% responsible diamond suppliers	Scope 3 emissions (transportation, supply chain)	Data-driven strategy for emission reduction
2025	Engage only with RJC-certified partners	Supply chain engagement	Sustainable sourcing, transparency
2026	Transition 50% of office energy to renewable sources and streamline supplychain partners to accelerate carbon neutrality	Energy efficiency	Lower operational carbon footprint and green manufacturing facility
2027	Reduce 10% of logistics related issues	Transportation & logistics	Route optimization, sustainable freight solutions
2030	Achieve Carbon neutrality operational emissions	Scope 1 & 2	Green energy, office sustainability
2050	Align with industry-wide net-zero goals	Full value chain	Carbon neutrality across the supply chain

HOW WE'RE MAKING AN IMPACT

GRI – 303-1, 303-2, 303-3, 303-4, 303-5, 308-1, 414



Responsible Sourcing & Supply Chain Decarbonization

- Sustainable Supplier Engagement: We partner with low-carbon diamond manufacturers who use renewable energy and resource-efficient processes in cutting and polishing.
- Transparent Carbon Footprint Tracking: Engaging suppliers to measure and reduce their emissions, ensuring accountability throughout the value chain.



Sustainable Transportation & Logistics

- Optimized Shipping Routes: We leverage data-driven route planning to reduce fuel consumption and emissions in global diamond shipments.
- Low-Carbon Freight Partnerships: Working with logistics providers committed to carbon-neutral shipping options.
- Supply Chain Consolidation: Reducing the frequency of shipments by bundling orders, thereby lowering transportation-related emissions.
- Transition to Green Transport: Exploring electric and biofuel-powered freight solutions for key distribution channels.



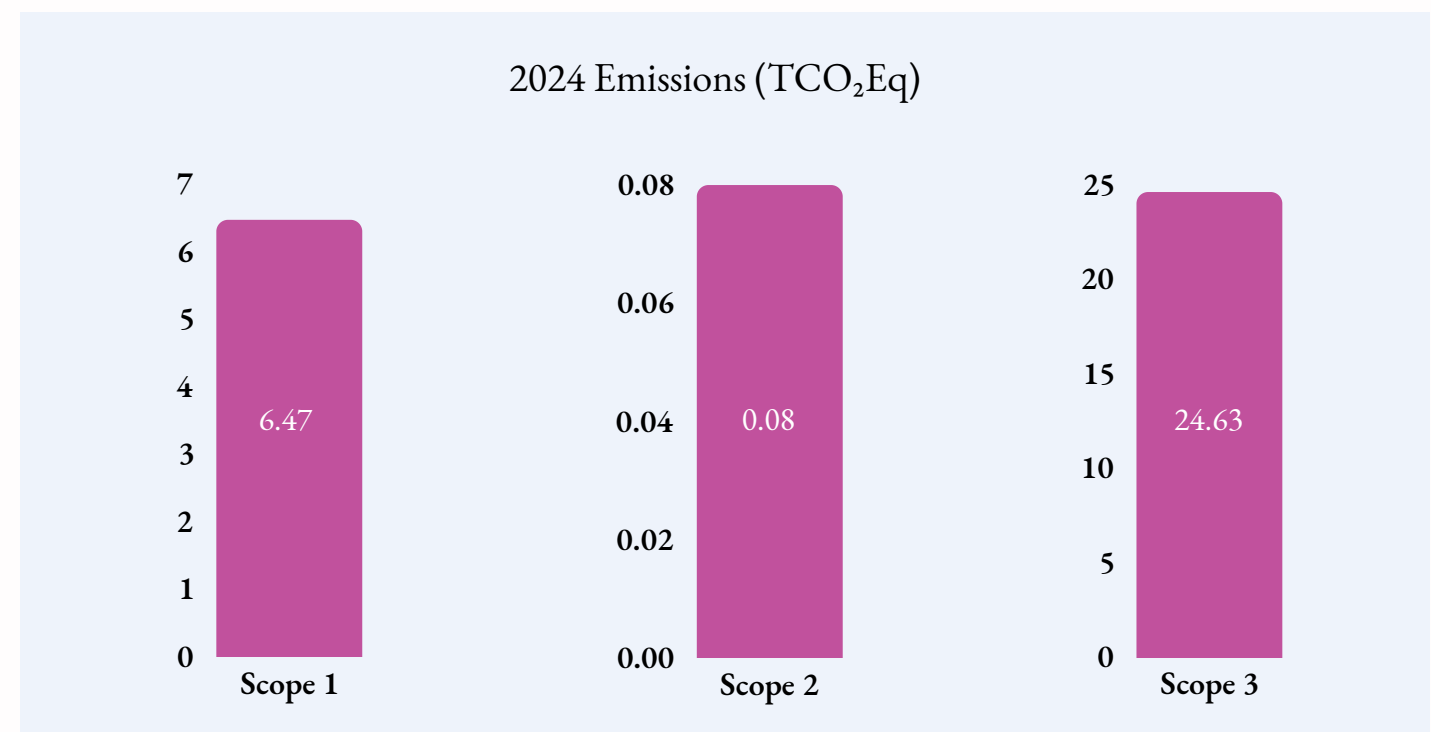
Energy Efficiency in Operations

- Sustainable Office Practices: By integrating smart energy solutions, including motion-sensor LED lighting, which alone provides an 83.33% absolute reduction in energy consumption over traditional bulbs, and energy-efficient appliances, offices can achieve substantial energy savings.
- Remote & Digital Collaboration: Reducing corporate travel emissions through virtual meetings and remote engagement with global clients and suppliers.
- Renewable Energy Exploration: Evaluating potential investments in green energy solutions for office operations.

Our Carbon Footprint: GHG & Energy Data

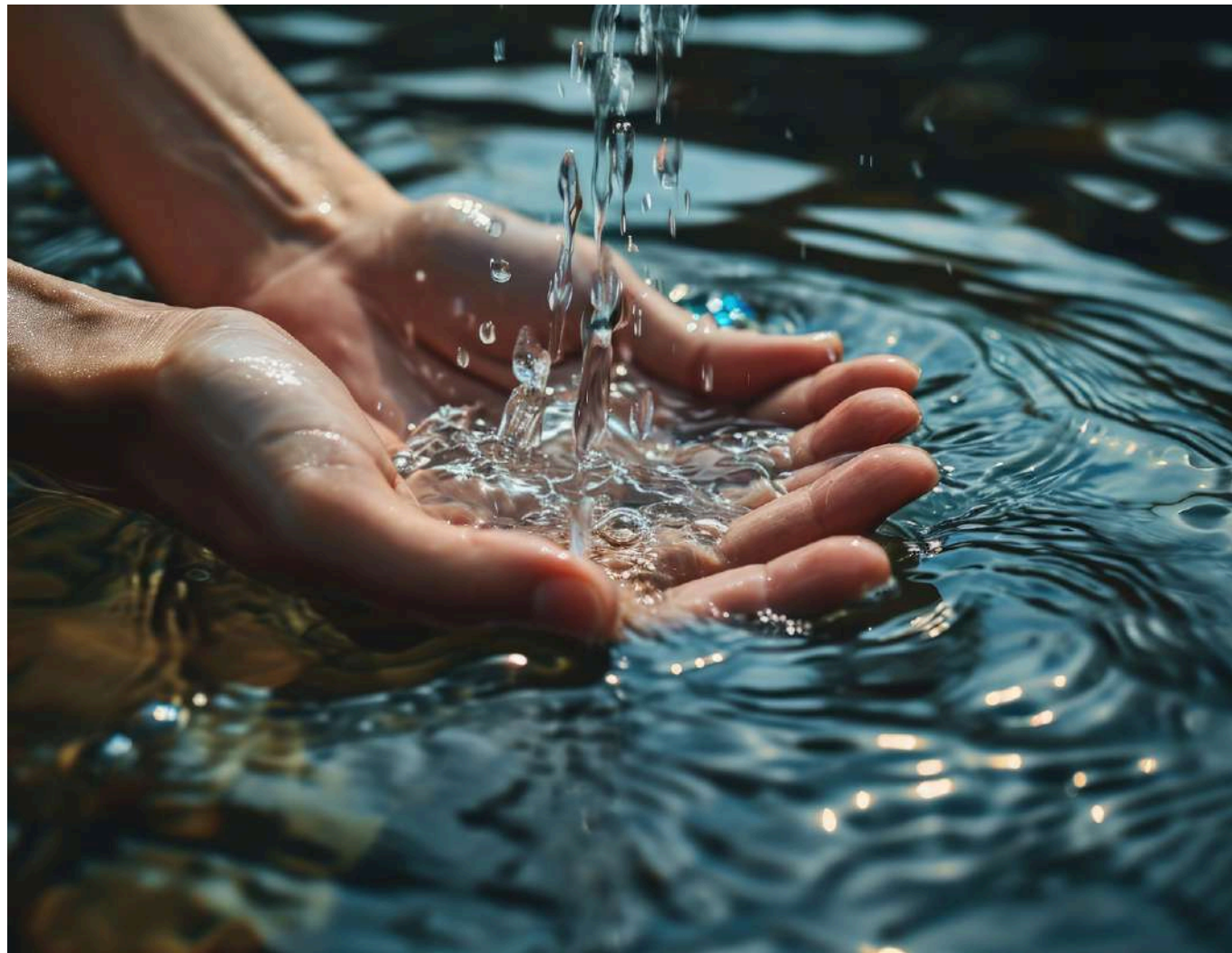
We are actively tracking our carbon footprint, with a primary focus on Scope 3 emissions from sourcing, transportation, and logistics. Below is an overview of our environmental impact:

Category	Emission Source	2024 Emissions (TCO ₂ Eq)	Reduction Measures
Scope 1	Natural gas (stationary combustion), Refrigerant leaks (R410A)	6.47	Transition to renewable heating systems; improve HVAC maintenance to prevent leaks
Scope 2	Imported electricity	0.08	Switch to renewable energy providers; install energy-efficient lighting and systems
Scope 3	Employee commute, purchased goods, downstream transport, air travel, hotel stays, water, waste disposal	24.63	Promote remote work and public transport, source from low-emission suppliers, optimize logistics, reduce air travel, implement sustainable procurement and waste minimization



CARBON NEUTRALITY

Water Stewardship: Strengthening Our Carbon Neutrality Commitment



At Primestar, our journey toward carbon neutrality extends beyond reducing greenhouse gas emissions—it also encompasses responsible water management across our operations and supply chain. While our direct operations do not involve high water consumption, with a total usage of only 10 cubic meters during the reporting period, we recognize that water and carbon footprints are interconnected, especially within the diamond sourcing, cutting, and polishing processes. Through supplier engagement, operational efficiency, and collective action, we ensure that water conservation aligns with our broader sustainability goals.

Aligning Water Management with Our Climate Strategy

As a signatory to the Science Based Targets initiative (SBTi), Primestar is committed to reducing environmental impact across its value chain. Effective water management plays a crucial role in:

- Reducing Scope 3 emissions by engaging with suppliers on sustainable water practices in diamond processing.
- Supporting circular resource use—minimizing water waste contributes to energy savings in water treatment and reduces supply chain emissions.
- Enhancing supply chain resilience against climate risks, such as water scarcity affecting diamond-producing regions.

Commitment to a Water-Resilient Future

Enhanced Supplier Water Standards:
Strengthening assessments to ensure partners follow sustainable water practices.

Reduced Corporate Water Consumption:
Continuing conservation efforts to optimize usage in our facilities.

Industry Collaboration: Promoting water-efficient practices across the luxury and jewelry industry.

By connecting water conservation to our carbon neutrality roadmap, Primestar is reinforcing its commitment to a sustainable future—one that respects both the climate and vital natural resources.

Looking Ahead: A Shared Responsibility

Our journey toward carbon neutrality is a collaborative effort—one that requires strong streamlined partnerships with miners and manufacturers, innovation, and a shared vision for a sustainable diamond industry. By aligning with SBTi, Primestar is setting the standard for responsible diamond trading, demonstrating that even non-manufacturing entities can drive impactful climate action.

Together, we are transforming sustainability commitments into measurable action—one carat, one shipment, and one carbon reduction at a time.



At Primestar, we treat every drop as precious - aligning water responsibility with our path to carbon neutrality and ethical excellence.



WASTE MANAGEMENT OR PACKAGING WASTE MANAGEMENT

GRI – 306-1, 306-2, 306-3, 306-4, 306-5, 301-2, 204-1, ESRS E5-1 TO E5-5

At Primestar, sustainability is woven into every facet of our operations, including how we manage waste. While we do not engage in diamond mining or manufacturing, we acknowledge our role in reducing environmental impact by optimizing waste management practices across our offices, supply chain, and logistics.

Smart Waste Management in Our Operations

Recognizing that traditional office operations contribute to paper, electronic, and packaging waste, we have implemented a digital-first approach to minimize our footprint:

- **Waste Segregation and Monitoring:** We categorize our waste into three streams—paper waste, plastic waste, and general non-recyclable waste—ensuring responsible disposal. Internally, we track and collect waste data on a weekly basis.
- **Paperless Operations:** Transitioning to digital invoicing, blockchain-based traceability (iTraceit) and cloud-based documentation.
- **Sustainable Packaging:** Encouraging the use of biodegradable, recyclable, and reusable packaging for diamond transportation, reducing single-use plastics.

Supply Chain Engagement: Circular Thinking

Waste reduction doesn't stop at our offices—we extend our commitment to partners and suppliers to ensure sustainable practices across the value chain:

- **Ethical Sourcing Standards:** Collaborating with responsible suppliers who follow waste-efficient cutting and polishing methods, minimizing industrial waste.
- **Closed-Loop Packaging System:** Engaging with logistics partners to adopt returnable and recyclable packaging materials.
- **Encouraging Circular Economy Practices:** Supporting responsible diamond repurposing and resale initiatives to extend product life cycles.

Employee Awareness & Green Initiatives

Waste management starts with awareness. We foster a culture of sustainability by:

- Conducting sustainability training to promote responsible waste reduction.
- Implementing office waste segregation and reducing reliance on single-use materials.

Waste Reduction Performance

To track our progress, we continuously measure and refine our waste management efforts.



Category	2024	Reduction Target - 2025
Paper Waste Reduction	20,000 sheets	80% digital operations
Sustainable Packaging	65% adoption	100%

Looking Ahead: Innovation for a Greener Future

Primestar is committed to leading sustainable transformation in the diamond trading sector. By embedding circular economy principles into our operations and supply chain, we are setting new benchmarks for environmental responsibility - one carat at a time.



PRESERVING BIODIVERSITY

GRI – 303-1, 304-1, 304-2, 304-3, 304-4, 308-1, ESRS E4-1 TO E4-5

At Primestar, we recognize that biodiversity is the foundation of a thriving planet. Healthy ecosystems are essential for communities, climate stability, and sustainable business operations. As a diamond distribution company, our direct environmental impact may be minimal, but our influence on biodiversity extends through our supply chain partnerships.

By sourcing diamonds exclusively from reputed mining companies to ensure that our diamonds come from responsible, sustainability-driven mining operations. These globally recognized suppliers adhere to the highest environmental and ethical standards, prioritizing land restoration, habitat preservation, and sustainable mining practices.

Our Supply Chain’s Positive Contribution to Biodiversity

By ensuring our diamonds originate from miners such as Rio Tinto, Burgundy, ODC, De Beers and Petra Diamonds, we support:

- Deforestation-Free Mining : Suppliers operate under strict land-use regulations to prevent habitat destruction.
- Wildlife & Ecosystem Protection: Active conservation projects in and around mining sites.
- Water Stewardship: Implementation of water-efficient mining and recycling programs.
- Land Rehabilitation & Reforestation: Restoration of mined land to native ecosystems after operations.
- Community-Based Conservation: Engaging local communities in biodiversity protection efforts.

Supply Chain Engagement: Circular Thinking

Waste reduction doesn't stop at our offices—we extend our commitment to partners and suppliers to ensure sustainable practices across the value chain:

- Ethical Sourcing Standards: Collaborating with responsible suppliers who follow waste-efficient cutting and polishing methods, minimizing industrial waste.
- Closed-Loop Packaging System: Engaging with logistics partners to adopt returnable and recyclable packaging materials.
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- Implementing office waste segregation and reducing reliance on single-use materials.

Biodiversity Risk Mitigation Strategy

Applying the Mitigation Hierarchy Across Our Supply Chain

We implement a structured Risk Mitigation Strategy to ensure biodiversity is protected throughout our supply chain.

Mitigation Stage	Actions at Primestar	Actions in Our Supply Chain
Avoidance	Partner only with suppliers who operate outside protected areas and follow responsible sourcing standards.	Suppliers conduct environmental impact assessments before any land use.
Minimization	Ensure supply chain partners adopt sustainable extraction and processing practices.	Suppliers implement biodiversity-friendly mining techniques and minimize deforestation.
Restoration	Support reforestation and land reclamation initiatives in sourcing regions.	Suppliers commit to land rehabilitation, including soil restoration and native vegetation planting.
Offsetting	Invest in conservation programs to enhance global biodiversity.	Suppliers participate in local wildlife conservation efforts and ecosystem restoration projects.

Positive Supply Chain Impact on Biodiversity

By integrating biodiversity-conscious sourcing into our supply chain strategy, Primestar contributes to:

- Deforestation-Free Supply Chain – Ensuring our suppliers follow strict land-use regulations.
- Wildlife Protection – Partnering with suppliers who prioritize habitat preservation.
- Sustainable Water Management – Encouraging water-efficient mining techniques in the upstream supply chain.
- Community-Based Conservation – Supporting suppliers engaged in local environmental restoration efforts.

Metric	2024	Target 2025
% of traceable diamonds by country	100%	Maintain
% of traceable diamonds by Mining Company	50%	100%
% of traceable diamonds by mine	20%	50%

At Primestar, we believe that every diamond should be a symbol of sustainability, ethical responsibility, and environmental stewardship. By strengthening biodiversity efforts across our supply chain, we ensure that our diamonds contribute to a greener, more sustainable future.

PRESERVING BIODIVERSITY

GRI – 303-1, 304-1, 304-2, 304-3, 304-4, 308-1, ESRS E4-1 TO E4-5

Our Roadmap for Nature and Biodiversity

At Primestar, we believe that true luxury shines brightest when it leaves nature unharmed—and ideally, restored. Our diamonds may pass through the hands of artisans and experts, but they originate in places shaped by nature’s quiet mastery. Recognizing this, we have begun a thoughtful and evolving journey to safeguard the natural systems that silently support our business—from soil and water to forests, wildlife, and ecosystems.

Our Nature and Biodiversity Roadmap is not just a sustainability pledge; it is our blueprint for progress—a dynamic strategy to assess, act, and advance positive impact across the value chain. As part of the roadmap development process, Primestar is reviewing relevant global and regional nature-related regulations and voluntary frameworks, including the Taskforce on Nature-related Financial Disclosures (TNFD), the Global Biodiversity Framework (GBF), and EU environmental directives. We are evaluating how these align with our existing environmental policies and ESG systems to identify areas for enhancement. This ensures our future nature strategy remains aligned with international best practices, regulatory expectations, and evolving stakeholder demands.

Phase	Key Focus Area	Examples of Action	Status
Assess	Understand dependencies and impacts on nature	Supplier EIAs, biodiversity screening, exclusion of protected areas	Completed
Act	Minimize environmental impact in the supply chain	Land rehabilitation, water stewardship, circular packaging, sustainable logistics	Ongoing
Commit	Formalize a biodiversity roadmap aligned with best practices	Roadmap development initiated; tailored to SME scale and supplier influence	In Progress
Transform (Nature-Positive)	Contribute to nature’s restoration and regeneration	Future targets for biodiversity-positive suppliers, habitat protection, and restoration measurement	Planned
Disclose	Report measurable biodiversity and nature-related impact	Plans to include nature KPIs in ESG dashboard, supplier metrics, and clear separation from GHG target calculations	Planned

Phase 1: Assessing Our Impact

We have already taken significant steps to understand our upstream dependencies on nature. Although Primestar does not engage in mining, we source from regions where natural ecosystems are involved in diamond extraction and processing.

- We maintain a strict sourcing policy that prioritizes suppliers operating outside protected or ecologically sensitive areas.
- We conduct supplier traceability assessments to evaluate the origin of rough and polished diamonds and their associated environmental risks.

Phase 2: Taking Action to Minimize Harm

Building on our assessments, we actively integrate sustainability into sourcing and logistics:

- Sourcing exclusively from suppliers that implement environmental safeguards such as land rehabilitation, reforestation, and biodiversity conservation at mining sites.
- Prioritizing suppliers that follow responsible cutting and polishing practices—focusing on energy-efficient equipment and reduced chemical use in processing.
- Adopting low-carbon logistics strategies, including optimized shipping routes, bulk consolidation of shipments, and partnerships with freight providers offering carbon-efficient options.
- Utilizing sustainable packaging, such as recyclable or returnable diamond pouches and presentation cases, and promoting waste-reducing practices across storage and transit operations.
- Encouraging circularity, including the repurposing of small diamonds and support for resale and re-certification pathways, helping to extend product lifecycles and reduce material demand.

Phase 3: Committing to a Formal Roadmap

We are currently developing a formal Nature and Biodiversity Roadmap, to be finalized within the next 12 months. This roadmap will align with global best practices and will be customized to our role as a trading SME with significant supplier influence and expanding upstream.

The roadmap will include:

- Measurable objectives for biodiversity integration,
- A structured strategy to align with nature-related frameworks,
- A timeline for embedding this roadmap into our ESG performance system.

Phase 4: Advancing Toward Nature-Positive Outcomes

Our future ambition is to move from harm reduction to nature-positive action, where our operations and partnerships contribute directly to restoring ecosystems.

Planned initiatives include:

- Increasing partnerships with biodiversity-certified suppliers,
- Defining indicators for land rehabilitated, water conserved, and species or habitats protected,
- Creating a restoration-linked supplier engagement program.

RISK MANAGEMENT & DEPENDENCIES

GRI – 204, 303, 304, 305, 306, 416-1, 419-1, ESRS 2 IRO-1 TO IRO-3

Material Environmental Dependencies Across the Value Chain

While Primestar’s direct operations have minimal environmental impact, we depend heavily on natural systems across our upstream and logistics value chains. The table below outlines key business activities, our dependencies on nature, and associated environmental impacts.

Aspect	Risk	Mitigation Strategy	Opportunity	Strategic Action
Water Resource Management	Indirect water impact from diamond mining by suppliers.	Partnering and streamlining with miners and manufacturers that adopt closed-loop water recycling and efficient water use practices.	Promoting water-smart sourcing.	Advocate for water conservation measures within the supply chain and ensure responsible sourcing.
Waste Generation & Circularity	Packaging waste and indirect waste from suppliers' operations.	Encouraging suppliers to adopt responsible waste management and use recyclable materials in packaging.	Circular economy leadership through sustainable packaging solutions.	Transition to minimal, recyclable, and reusable packaging for diamonds.
Biodiversity & Ecosystem Impact	Sourcing from biodiversity-sensitive areas through suppliers.	Partnering with suppliers that restore mining sites, engage in conservation programs, and minimize ecological impact.	Strengthening ethical sourcing reputation.	Work with suppliers that commit to land rehabilitation, wildlife protection and sustainable mining practices.

Aspect	Risk	Mitigation Strategy	Opportunity	Strategic Action
Biodiversity & Ecosystem Impact	Sourcing from biodiversity-sensitive areas through suppliers.	Partnering with suppliers that restore mining sites, engage in conservation programs, and minimize ecological impact.	Strengthening ethical sourcing reputation.	Work with suppliers that commit to land rehabilitation, wildlife protection and sustainable mining practices.
Regulatory & Market Expectations	Increasing global sustainability expectations for the diamond industry.	Aligning with SBTi and responsible sourcing certifications.	Competitive advantage through ESG leadership.	Enhance sustainability disclosures and engage in industry-wide sustainability collaborations.

Primestar is committed to balancing risk and opportunity by driving responsible sourcing, reducing environmental impact, and fostering a sustainable diamond value chain. Through our strategic supplier partnerships and dedication to ESG principles, we ensure a greener, more resilient future for the industry.

As a diamond company with no direct extraction or processing operations, Primestar's environmental and community impacts are primarily indirect. However, we work closely with upstream partners to ensure material risks to nature and communities are identified and addressed. While we have not conducted direct community consultations, we engage with suppliers who are required to conduct Environmental and Social Impact Assessments and uphold stakeholder rights under internationally recognized frameworks.



RISK MANAGEMENT & DEPENDENCIES

GRI – 204, 303, 304, 305, 306, 416-1, 419-1, ESRS 2 IRO-1 TO IRO-3

Material Environmental Dependencies Across the Value Chain

While Primestar’s direct operations have minimal environmental impact, we depend heavily on natural systems across our upstream and logistics value chains. The table below outlines key business activities, our dependencies on nature, and associated environmental impacts.

Business Activity	Dependency on Natural Systems	Associated Material Impacts	Type of Impact	Value Chain Location
Rough diamond sourcing	Land access, ecological balance, clean water, biodiversity stability	Deforestation, habitat disruption, water pollution, biodiversity loss	Upstream (indirect)	Mining countries (Botswana, Namibia, South Africa, Canada, Australia, etc.)
Polishing and processing (via suppliers)	Energy (electricity), water for cooling, chemical inputs	Energy use, chemical discharge, GHG emissions (Scope 3)	Upstream (indirect)	Supplier locations (Surat, India.)
Global transportation & logistics	Fossil fuel energy, clean air	GHG emissions, air pollution, contribution to climate change	Midstream (direct/indirect)	Distribution & transit hubs
Packaging and presentation materials	Recycled/recyclable material availability	Waste generation, plastic use, landfill impact	Midstream (direct)	At warehouse/ shipping centers

Business Activity	Dependency on Natural Systems	Associated Material Impacts	Type of Impact	Value Chain Location
Digital traceability tools	Electricity for data centers, device supply chains	Low impact, energy use (Scope 3), e-waste (long term)	Direct (low risk)	Operations (Belgium)
Office operations	Energy, water (minimal), waste management infrastructure	Low impact—mainly Scope 2 energy and general waste	Direct (low risk)	Belgium HQ

In the next phase of our roadmap, we aim to assess the geographic proximity of our upstream sourcing regions to areas of high biodiversity value, ecosystem fragility, and water risk. This includes identifying overlaps with designated protected areas, biodiversity hotspots, and high water-stress zones. These insights will strengthen our supplier engagement and help prioritize sourcing from regions that support nature-positive outcomes.



◆ SOCIAL COMMITMENT

SDG'S ALIGNED



EMPLOYEE WELL-BEING

GRI 403-1, 403-2, 403-5, 403-6, 403-9, ESRs S1-5 TO S1-7, S1-12, S1-13

Health and Safety

At Primestar, we are committed to ensuring a safe and secure workplace for all employees. As a diamond distribution company, our occupational health and safety priorities differ from those of mining and manufacturing operations. Our primary focus is on ergonomic workplace practices, employee well-being, security protocols, and emergency preparedness to maintain a risk-free working environment. All employees and own are covered under our structured Health and Safety Management System, which is guided by legal requirements and internationally recognised standards. The Health and Safety Management System undergoes periodic internal audits to ensure compliance with regulatory and international standards.

Health and Safety Policies (GRI 403-1)

Primestar follows a structured Health and Safety Policy that aligns with international best practices and regulatory requirements. Our policy includes:

- Regular risk assessments to identify workplace hazards.
- Emergency preparedness and response training.
- Employee wellness programs to address physical and mental health.
- Stringent security measures to protect employees and assets.
- Supplier engagement to promote ethical health and safety standards across the value chain.

Workplace Safety Measures

Primestar implements the following safety measures to protect employees:

Safety Measure	Description
Ergonomic Workspaces	Adjustable desks and chairs to prevent musculoskeletal issues and enhance comfort.
Fire Safety & Emergency Preparedness	Regular fire drills, evacuation plans, and first-aid training.
Workplace Security	Surveillance systems and access controls to ensure a secure working environment.
Health & Safety Training	Employees receive periodic training on office safety protocols and emergency response.

Physical & Mental Well-being

Primestar acknowledges that a holistic approach to health includes both physical and mental well-being. To support employees, the company offers:

- Mental Health Support: Access to counselling services and stress management programs.
- Wellness Initiatives: Encouraging physical activity through fitness programs and awareness sessions.
- Healthy Work-Life Balance: Flexible work arrangements to reduce stress and enhance productivity.

Health and Safety Performance (GRI 403-2, 403-9)

We monitor and report on workplace health and safety to maintain transparency. Below is our health and safety performance data for the reporting period:

Indicator	2024 Performance
Total workplace incidents and ill-health	0
Number of work-related injuries and days lost	0
Numbers of fatalities	0
Employee participation in health and safety training	100%
Emergency drills conducted	1 (Annually)
Ergonomic assessments completed	100 % of Employees covered
Supplier compliance with health and safety standards	100% (All key suppliers meet requirements)

Security and Emergency Preparedness (GRI 403-2)

Primestar prioritizes security and emergency preparedness due to the high-value nature of its trade. This is achieved through 24/7 surveillance systems and controlled access points at all office locations, complemented by theft prevention training for employees handling high-value diamonds. Furthermore, comprehensive emergency response procedures are in place to ensure employee safety during security-related incidents.

Supplier Engagement on Health and Safety (GRI 403-1, 403-9)

While Primestar does not engage in diamond mining, it actively engages with streamlined manufacturers to promote safe and ethical workplace practices. The company mandates that all suppliers adhere to international occupational health and safety standards, implement worker protection measures in cutting and polishing operations, and conduct regular safety audits to mitigate risks within their facilities (RJC certified as a minimum requirement).

BENEFITS AND COMPENSATION

GRI – 401-1, 401-2, 403-1, 403-2, 403-3, 404-1, 404-2, 405-1

At Primestar, we prioritize the well-being and growth of our employees, ensuring they are rewarded, supported, and engaged in their roles.

Competitive Salary & Incentives

We offer a competitive salary structure aligned with industry benchmarks, recognizing expertise and dedication. Performance-based incentives ensure employees are rewarded for their contributions to business growth and success.

Well-being Support

Employee well-being is essential and we provide health insurance coverage, including medical and accidental benefits. We also offer access to wellness programs, periodic health check-ups, and stress management resources to promote a healthy work-life balance.

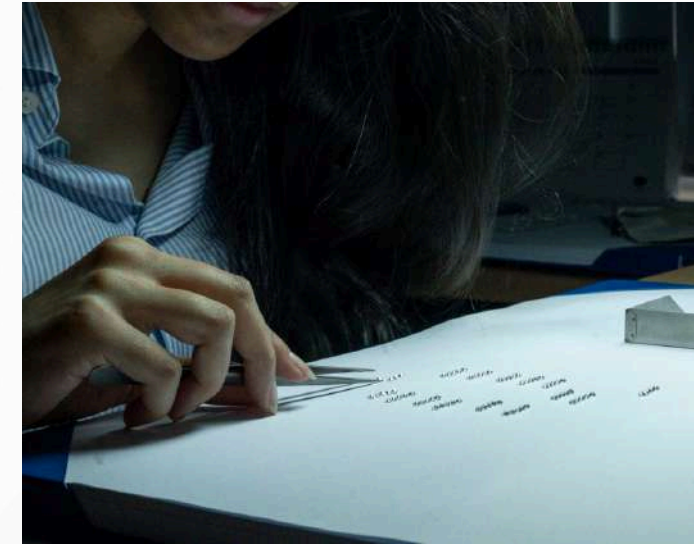
- lunch vouchers: Employees receive a €6 daily lunch allowance, which can be used at various food establishments, promoting accessibility to nutritious meals during the workday.

Recognition & Employee Engagement:

We foster a culture of appreciation and recognition through milestone celebrations, performance acknowledgments, and engagement activities. Employees are encouraged to participate in industry events, training programs, and team-building initiatives, strengthening collaboration and professional development. At Primestar, we believe in creating a rewarding and supportive work environment, ensuring every employee feels valued and motivated.

Work-Life Balance & Mental Well-being

At Primestar, we recognize that a healthy work-life balance plays a vital role in employee morale and sustained productivity. We offer wellness initiatives such as periodic health check-ups, stress relief sessions, and access to mindfulness tools to promote mental and emotional resilience. Our mental well-being efforts include confidential counselling support, mental health awareness sessions, and resources for managing workplace pressure. These steps aim to create a positive, inclusive environment where employees feel cared for, energized, and empowered to thrive personally and professionally.



POWER OF EQUALITY

GRI – 2-7, 2-8, 401-2, 405-1, 405-2, 406-1, ESRs S1-3, S1-4, S1-6, S1-12, S1-13

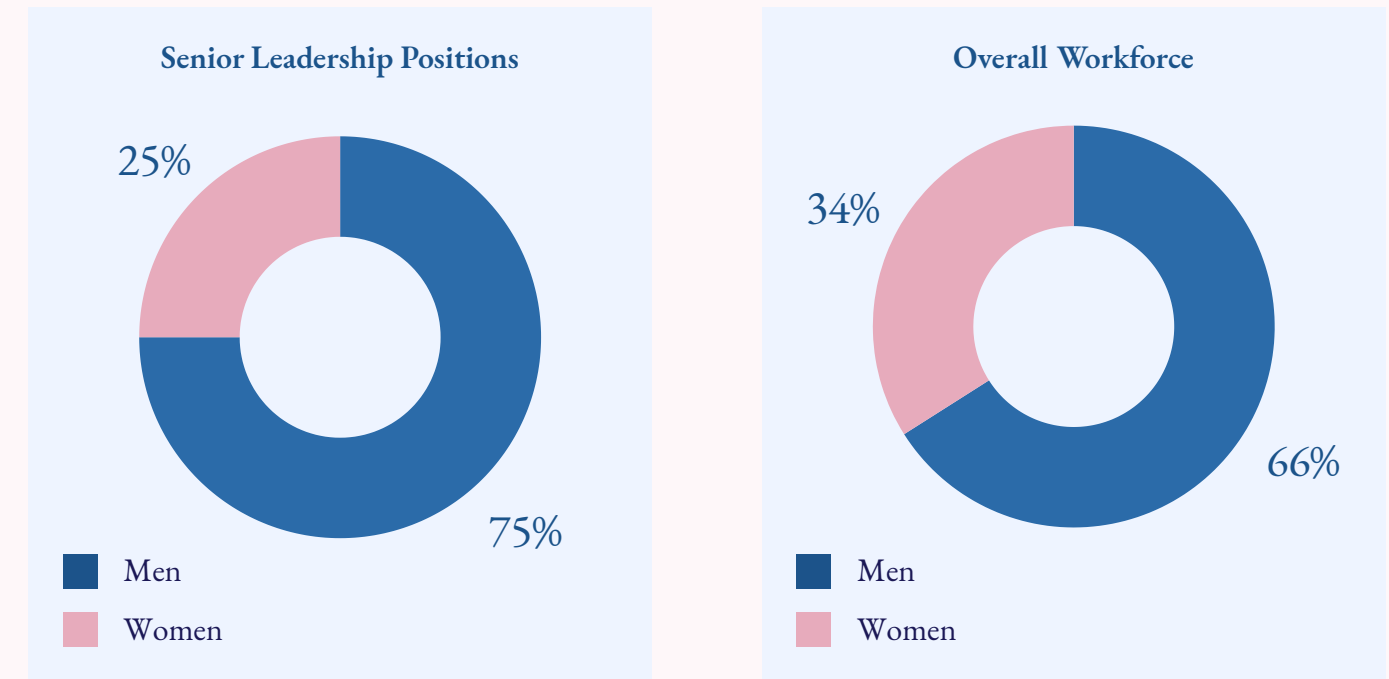


Empowering women isn't just about representation—it's about creating a culture where talent thrives, leadership flourishes, and equality is the standard.

Priti Parikh,
Co-Founder & Managing Director,
Primestar

At Primestar, women are not just participants in the industry—they are leaders, decision-makers, and changemakers. As a woman-led company, we take pride in fostering an environment that promotes equal opportunities, professional growth, and a thriving workplace for all.

Gender Equality at a Glance



Data represents internal workforce distribution at Primestar.

Indicator	Women	Men	Target
Senior Leadership Positions	25%	75%	20% increase gender equality by 2030
Overall Workforce	34%	66%	
Equal Pay for Equal Work	Yes	Yes	
Leadership Development	Active	Active	
Flexible Work Policies	Available	Available	

POWER OF EQUALITY

GRI – 2-7, 2-8, 401-2, 405-1, 405-2, 406-1, ESRs S1-3, S1-4, S1-6, S1-12, S1-13



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Breaking Barriers & Creating Opportunities



Women in Leadership: With women at the helm, Primestar ensures strong female representation in decision-making roles.



Equal Pay Commitment: We maintain a 100% pay parity policy, ensuring that compensation is based on skills and contribution—not gender.



Inclusive Workplace Policies: Our work culture supports women with flexible work.



100% Local Hiring: By prioritizing local talent, we contribute to regional economic growth, provide employment opportunities, and strengthen community ties.

Skills Development

At Primestar, we believe that continuous learning is the key to excellence in the diamond industry. Through tailored training sessions, expert-led workshops, and industry exposure, we empower our employees with the knowledge and skills needed to excel in diamond industry.

We provide opportunities for professional development in areas such as diamond grading, ethical sourcing, and market analytics, ensuring our team stays ahead in a dynamic industry. By fostering a culture of learning and collaboration, we encourage employees to refine their expertise, embrace innovation, and grow alongside the company.

Empowering Women Beyond Our Company

Primestar extends its commitment to gender equality beyond the workplace by supporting fair trade practices and ethical sourcing that empower women across the diamond supply chain. Through responsible sourcing, we work with suppliers who prioritize:

- Fair Wages & Safe Working Conditions for women in diamond-cutting and trading hubs.
- Entrepreneurial Opportunities for women artisans in diamond-producing regions.
- Transparent & Ethical Sourcing to ensure women in the industry are not marginalized.



COMMITMENT TO HUMAN RIGHTS

GRI 407-1, GRI 408-1, GRI 409-1, GRI 406-1, GRI 403-1, GRI 412-1, GRI 412-2, GRI 412-3, GRI 419-1, GRI 204-1, ESRS S1-4, S1-7, S1-10, S2-1 TO S2-6

At Primestar, we are committed to upholding and promoting human rights across our operations and supply chain. Our approach aligns with internationally recognized principles, ensuring dignity, fairness, and ethical practices in every aspect of our business.

Commitment to Global Human Rights Standards

Primestar adheres to the United Nations Universal Declaration of Human Rights and the UN Guiding Principles on Business s legislation.

Our Human Rights & Social Policy Covers:

Key Human Rights Aspects	Primestar' Commitment
Child Labour	Strictly prohibited in compliance with ILO standards.
Forced Labour	Zero tolerance for any form of forced or bonded labour.
Freedom of Association & Collective Bargaining	Employees have the right to freely associate and engage in collective bargaining.
Non-Discrimination	A diverse and inclusive work environment with equal opportunities for all.
Health & Safety	Safe and supportive workplace conditions in accordance with regulatory requirements.
Fair Working Hours & Remuneration	Compliance with Belgian labour laws to ensure fair wages and work hours.
Discipline & Grievance Procedures	Transparent mechanisms for addressing employee concerns and ensuring fair treatment.

Responsible Sourcing & Ethical Supply Chain

As a select member of the World Diamond Council, we strictly adhere to the System of Warranties, ensuring that all diamonds sourced comply with the Kimberley Process Certification Scheme. We collaborate only with responsible suppliers who share our commitment to ethical sourcing and human rights.

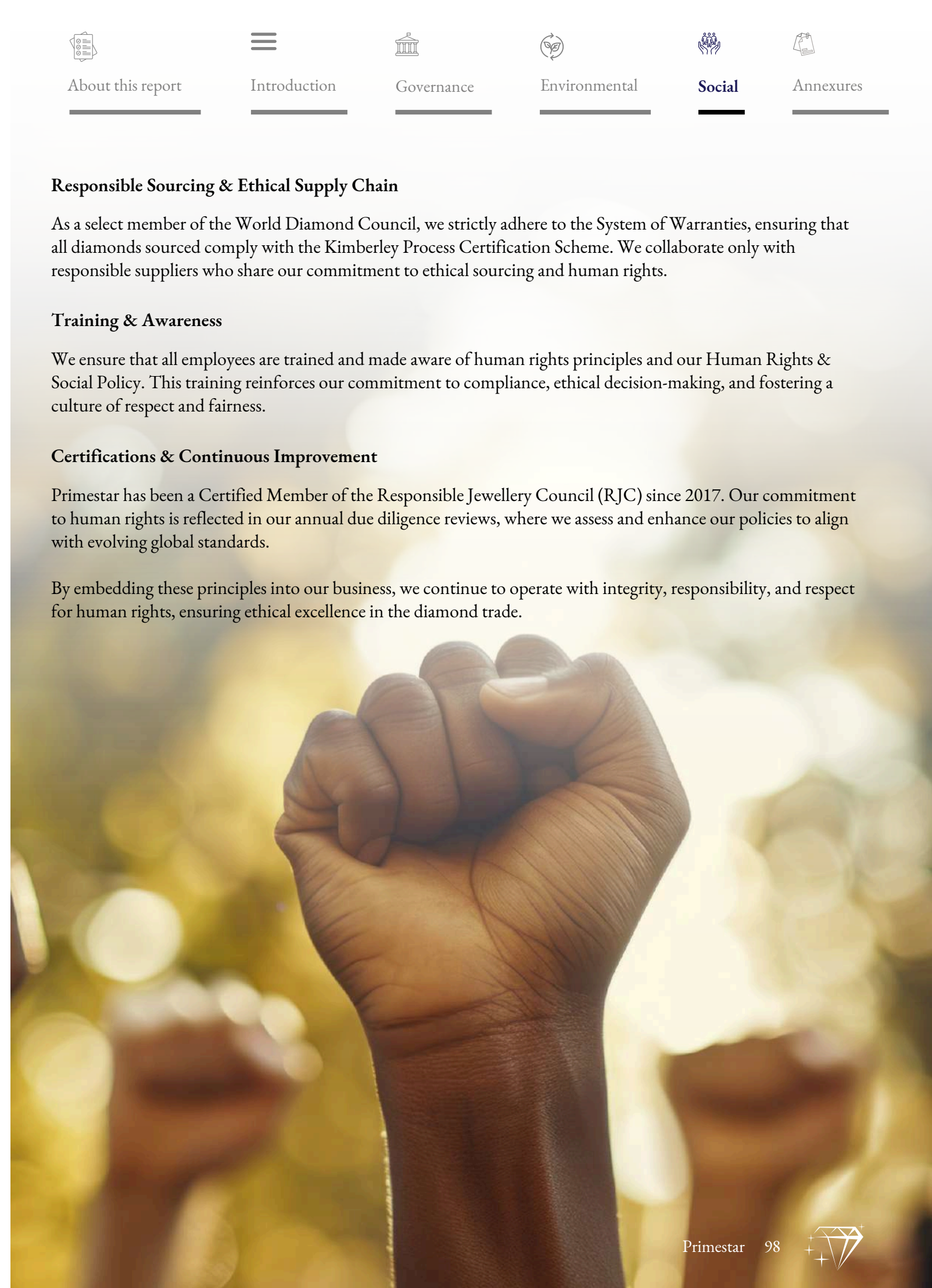
Training & Awareness

We ensure that all employees are trained and made aware of human rights principles and our Human Rights & Social Policy. This training reinforces our commitment to compliance, ethical decision-making, and fostering a culture of respect and fairness.

Certifications & Continuous Improvement

Primestar has been a Certified Member of the Responsible Jewellery Council (RJC) since 2017. Our commitment to human rights is reflected in our annual due diligence reviews, where we assess and enhance our policies to align with evolving global standards.

By embedding these principles into our business, we continue to operate with integrity, responsibility, and respect for human rights, ensuring ethical excellence in the diamond trade.



COMMUNITY DEVELOPMENT

GRI – 204-1, 305-1, 406-1, 404-2, 412-1, ESRS S3-1 TO S3-3

At Primestar, corporate social responsibility (CSR) is more than just an obligation—it is an integral part of our ethical business framework. As a responsible diamond company, we believe in fostering sustainable development, supporting the communities we operate in, and driving positive environmental and social change. Our CSR approach focuses on four key areas: education and development, inclusivity and ethics, environmental stewardship, and ethical sourcing.

Investing in a Sustainable Future

Our commitment to social and environmental impact goes beyond policy—we take action. In FY2024, we invested €30,000 in CSR initiatives, reinforcing our dedication to education, inclusivity, and sustainability. These investments help empower future industry professionals, promote ethical business practices, and support climate-conscious initiatives.

Commitment to Education & Skill Development

Knowledge and skill development are critical for sustaining the integrity and expertise of the diamond industry. Primestar actively supports initiatives that enhance industry knowledge and build capacity among professionals. through our sponsorship of the "From Mine to Finger" Educational Program, conducted in collaboration with Antwerp Summer University and the Gordon Institute of Business Science, we provide students with a comprehensive understanding of the diamond supply chain. This initiative educates future industry professionals on the journey of a diamond—from its extraction at the mine to its transformation into a cherished piece of jewelry-

ensuring they are equipped with insights into ethical sourcing, supply chain transparency, and sustainable trade practices. Also OrigemA – funds used to impletment traceabilty to support artisanal mining.

Fostering Inclusivity & Ethical Business Practices

As a women-led enterprise, inclusivity is at the heart of our operations. We uphold the United Nations Universal Declaration of Human Rights, ensuring that every individual associated with our business is treated with dignity and respect. Our policies emphasize zero tolerance for discrimination, forced labor, and human rights violations, and we actively promote equal opportunities for all, regardless of gender, background, or affiliation.

Environmental Responsibility & Climate Action

While PRIMESTAR operates in the distribution segment of the diamond value chain, we recognize our responsibility toward environmental sustainability. We are committed to reducing our carbon footprint and supporting initiatives that align with global climate goals. As part of our sustainability efforts, we adhere to the Science Based Targets initiative (SBTi), focusing on reducing emissions associated with our operations. Additionally, we engage with responsible suppliers who share our commitment to environmentally friendly practices.



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FACETS 2024



FACETS 2024: Shaping the Future of the Diamond Industry

As a diamond sponsor of FACETS2024, Primestar reaffirmed its commitment to industry leadership and sustainable business practices. FACETS2024 is a premier platform that brings together global diamond professionals to discuss emerging trends, responsible sourcing, and advancements in technology.

This industry-leading event provides:

- Networking opportunities for traders, suppliers, and industry experts.
- Insightful discussions on sustainability, traceability, and ethical business practices.
- Showcasing of innovations in diamond trading, grading, and sourcing.



COMMUNITY DEVELOPMENT

GRI – 204-1, 305-1, 406-1, 404-2, 412-1, ESRS S3-1 TO S3-3

Ensuring Ethical Sourcing & Responsible Trade

Integrity and ethical sourcing are fundamental to Primestar. We strictly adhere to the Kimberley Process Certification Scheme (KPCS) and the World Diamond Council (WDC) System of Warranties, ensuring that every diamond we trade is conflict-free and sourced from responsible suppliers. Transparency in our supply chain is a key priority, and we continuously work towards strengthening due diligence processes to uphold ethical trading standards.

CSR Impact & Contributions

Focus Area	Initiative	Impact
Education & Development	Partnering with OrigemA & Antwerp Summer University for skill-building programs.	Strengthening industry knowledge & expertise.
Forced Inclusionity & Ethics Labour	Upholding the United Nations Universal Declaration of Human Rights.	Zero tolerance for discrimination & abuse.
Environmental Stewardship	Align Science Based Targets initiative (SBTi).	Reducing GHG emissions & climate impact.
Ethical Sourcing	Compliance with Kimberley Process & WDC System of Warranties.	Ensuring 100% conflict-free diamond trade.
CSR Investment	€30,000 allocated to social and sustainability initiatives.	Strengthening education, inclusion & sustainability.



CUSTOMER SATISFACTION

GRI 416-1, 416-2, 417-1, 417-2, ESRS S4-1 TO S4-2

At Primestar, customer satisfaction is not just a goal—it is a fundamental pillar of our business. Our commitment to delivering quality, transparency, and long-term value ensures that customers receive the best experience in every transaction.

Quality Assurance

We uphold the highest standards of diamond quality, ensuring that every stone meets stringent grading criteria with a rejection rate less than 1%. Through rigorous internal laboratory standards quality checks, we guarantee that customers receive diamonds that match their exact specifications.

Customer Trust & Transparency

Building trust with our clients is central to our operations. We ensure complete traceability in our sourcing and follow Responsible Jewellery Council (RJC) standards. By prioritizing ethical sourcing and compliance with Anti-Money Laundering (AML) regulations, we offer our customers confidence in every purchase.

Long-Term Relationships

At Primestar, we believe in fostering lasting partnerships rather than one-time transactions. Our customer-first approach ensures personalized service, competitive pricing, and consistent engagement. By providing education on diamond authenticity and ethical sourcing, we empower our clients to make informed decisions.

Customer Satisfaction Metrics

To continuously enhance our customer experience, we track key performance indicators:

Aspect	Commitment	Impact
Quality Standards	100% certification of diamonds sold	Ensures trust & authenticity
Ethical Sourcing	Full compliance with RJC & AML regulations	Strengthens transparency & credibility
Customer Retention Rate	100% repeat clients	Reflects strong relationships
Client Feedback & Support	Proactive engagement & resolution of concerns	Enhances satisfaction & loyalty
Rejection Rate	Less than 1%	Instills confidence and reliability





FUTURE PRACTICES



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KPI ROADMAP

At Primestar, our KPI Roadmap defines measurable, time-bound targets across environmental, social, and governance dimensions. These targets reflect our strategic priorities and are designed to drive continuous improvement across both our direct operations and upstream value chain. To ensure accountability, we have implemented structured monitoring systems—supported by digital tools, supplier engagement mechanisms, and third-party reviews—to track progress against these goals. Environmental and social KPIs are tracked through quarterly internal reviews and annual assessments in collaboration with partners such as Growlity.Inc. ESG-related supplier performance is monitored through compliance audits, traceability tools, and engagement platforms. These monitoring efforts allow us to assess progress, identify improvement areas, and align with internationally recognized sustainability frameworks such as GRI and the GHG Protocol.

Pillar	KPI	Target	SDG's Alignment
Environmental	Scope 3 emissions reduction (transportation, suppliers)	25% reduction by 2030	
	Percentage of suppliers assessed for environmental compliance	100% of key suppliers by 2026	
	Percentage of responsibly sourced diamonds	100% maintain	
	Waste diversion from landfill (paper, packaging materials)	80% by 2027	
	Percentage of shipments using low-carbon transportation	50% of shipments by 2027	
	Renewable energy use in offices	50% of energy consumption from renewables by 2026	
	Alignment with UN Sustainable Development Goals (SDGs)	Full alignment with all SDGs by 2030	

Pillar	KPI	Target	SDG's Alignment
Social	Percentage of women in leadership roles	25% of leadership positions held by women	
	Supplier compliance with labor and human rights standards	100% adherence by 2026	
	Percentage of suppliers evaluated for fair labor practices	100% maintain	
	Employee participation in ESG training programs	100% of employees trained annually maintain	
	Supplier ESG capacity-building sessions	Quarterly sessions conducted	

Pillar	KPI	Target	SDG's Alignment
Governance	ESG integration in supplier selection criteria	100% of supplier contracts include ESG requirements	
	Percentage of board meetings with sustainability discussions	100% of meetings annually	
	Transparency in sustainability reporting	99% alignment with GRI standards.	
	Third-party audits for responsible sourcing	100% external audits conducted by 2026	

COMMITTED TO CHANGE

Our journey to Science Based Targets initiative (SBTi) Commitment



Primestar is actively aligning its climate strategy with the Science Based Targets initiative (SBTi) to reduce greenhouse gas (GHG) emissions in accordance with the goals of the Paris Agreement to limit global warming to 1.5°C above pre-industrial levels.

As an SME in the diamond trading sector, we understand the importance of setting credible, science-based climate targets. We are currently in the preparatory stage and intend to submit our formal commitment and targets under the SME SBTi pathway, which allows for a simplified, one-step process for small and medium-sized enterprises.

Our Progress Toward Commitment:

We are in the process of:

- Conducting a baseline emissions assessment across Scope 1, Scope 2, and relevant Scope 3 categories.
- Designing emission reduction pathways that focus on minimizing emissions from logistics, supplier operations, and downstream trading activities.
- Structuring our SBTi submission package, which will include our formal commitment and standardized near-term reduction targets in line with the SME guidance.

Once submitted, our targets will follow the streamlined SME validation process offered by the SBTi. This effort reflects our growing dedication to transparent, science-based climate action as part of our broader ESG journey.

COMMITTED TO CHANGE

Women's Empowerment Principles (WEPs)

At Primestar, we are dedicated to promoting gender equality and empowering women in the workplace, marketplace, and community. By endorsing the Women's Empowerment Principles, a joint initiative of UN Women and the UN Global Compact, we commit to:



Leadership: Establish high-level corporate leadership for gender equality.



Equality: Treat all women and men fairly at work—respect and support human rights and non-discrimination.



Health and Safety: Ensure the health, safety, and well-being of all women and men workers.



Education and Training: Promote education, training, and professional development for women.



Enterprise Development: Implement enterprise development, supply chain, and marketing practices that empower women.



Community Engagement: Promote equality through community initiatives and advocacy.



Transparency: Measure and publicly report on progress to achieve gender equality.

GROWLITY– PRIMESTAR

GRI 2-13, ESRS 2 GOV

In collaboration with Growlity Inc. – ESG & Sustainability Advisory Partner

In the dynamic world of diamond distribution, Primestar has always aimed to shine not just through the brilliance of our gems but through our unwavering commitment to sustainability. Our journey towards a more sustainable future has been significantly enriched by our collaboration with Growlity, a leader in climate change, ESG, and sustainability solutions.

Our Collaborative Milestones:

1. Strategic Alignment with Global Standards: With Growlity's expertise, we've seamlessly integrated the UN Global Compact's 17 Sustainable Development Goals (SDGs) into our core strategy, ensuring our operations promote global well-being.
2. Comprehensive ESG Framework Development: Growlity's guidance has been instrumental in crafting a robust ESG framework, aligning with our mission to create positive, sustainable development worldwide.
3. Enhance Environmental Strategies: Implementing Scope 3 emissions tracking, energy efficiency measures, and sustainable logistics to reduce our carbon footprint.
4. Empowering Through Education: Through tailored training sessions, Growlity has enhanced our team's understanding of sustainability, carbon management, and responsible supply chains, empowering us to embed these principles into our daily operations.
5. Transparent Sustainability Reporting: Leveraging Growlity's reporting services, we've adopted recognized global frameworks, enhancing our transparency and accountability in sustainability disclosures.

The Road Ahead:

Our partnership with Growlity has not only elevated our sustainability initiatives but has also positioned us as a responsible leader in the diamond trading industry. Together, we continue to explore innovative solutions, ensuring that our legacy is defined by brilliance, integrity, and a steadfast commitment to a sustainable future. At Primestar, we believe that every facet of our business should reflect our dedication to ethical practices and environmental stewardship. With Growlity by our side, we're not just adapting to the future—we're shaping it.



With Growlity's expertise, sustainability is no longer a goal—it's embedded in our strategy, actions and accountability.



DR. NITIN DUMASIA
President and CEO, Growlity



APPENDIX

07



SDG'S ALIGNED

4 QUALITY EDUCATION

5 GENDER EQUALITY

12 RESPONSIBLE CONSUMPTION AND PRODUCTION

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