

Vulcan and Co. – Grievance Mechanism Procedure

Updated: May 2025

1. Purpose

Vulcan and Co. is committed to operating with integrity, transparency, and respect for human rights across all its operations and supply chain. This grievance mechanism is established to provide stakeholders, including employees, suppliers, customers, and affected communities, with a safe and accessible way to raise concerns or complaints regarding any business practices that may violate our ethical, legal, or environmental commitments.

2. Scope

This mechanism is open to:

- Internal stakeholders (employees, interns, contractors)
- External stakeholders (suppliers, service providers, customers, civil society, and community members)

It covers concerns related to:

- Human rights
- Environmental practices
- Ethical conduct (e.g., bribery, fraud)
- Health & safety
- Labor rights
- Sourcing and provenance (e.g., Kimberley Process, Russia origin, synthetic disclosure)

3. Reporting Channels

Grievances may be submitted through the following confidential and accessible channels:

- Email: gil@vulcan-diamonds.com
- Phone: +972 (0)543974144
- In person: By request at our office in the Israel Diamond Exchange
- Grievances may also be submitted through the Israel Diamond Exchange website at www.isde.co.il.

Diamond Exchange – Yahalom Building, 21 Tuval St. Suite #772, Ramat Gan 52520, Israel.

Tel (972)3 6122737 Fax (972)3 7519023 Int 22124 secretary@vulcan-diamonds.com

www.vulcan-diamonds.com

Reports may be submitted anonymously, though providing contact details helps us investigate and resolve the concern more effectively.

4. Process for Handling Grievances

Once received, all grievances will be:

1. Acknowledged within 5 business days.
2. Reviewed and assessed to determine severity and appropriate course of action.
3. Investigated fairly and confidentially by a designated responsible person (currently Gil Melamed).
4. Responded to with outcomes and proposed resolutions, typically within 30 days.
5. Documented and recorded securely, with records retained for a minimum of 5 years.

We will involve the complainant in the resolution process where appropriate and will take corrective or preventive action if a breach is confirmed.

5. Non-Retaliation and Confidentiality

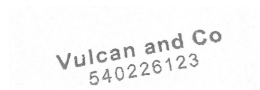
Vulcan ensures that anyone raising a concern in good faith will not face retaliation. All complaints will be handled confidentially to the extent possible and in compliance with applicable laws.

6. Continuous Improvement

We review this procedure regularly and integrate feedback from stakeholders to strengthen the mechanism and promote responsible business conduct.

Signed:

Gil Melamed
Managing Director
Vulcan and Co.



A handwritten signature in black ink, appearing to be "Gil Melamed", written over a light blue rectangular background.

Diamond Exchange – Yahalom Building, 21 Tuval St. Suite #772, Ramat Gan 52520, Israel.

Tel (972)3 6122737 Fax (972)3 7519023 Int 22124 secretary@vulcan-diamonds.com

www.vulcan-diamonds.com