

THE CONSTELL CODE OF CONDUCT

Guiding integrity, responsibility, and accountability in the diamond industry.

SEPTEMBER 2023



A MESSAGE FROM OUR CEO

The Constell Code of Conduct stands as a testament to our resolute dedication to upholding ethical excellence and unwavering integrity in every facet of our endeavors.

In my capacity as the CEO of Constell, it is my privilege to present this cornerstone document. It encapsulates the values we collectively cherish and delineates the standards, principles, legal obligations, and regulations that steer our engagements, choices, and daily routines at Constell.

I encourage you to take the opportunity to acquaint yourself with our Code of Conduct. I hold no uncertainty that it will prove to be an invaluable guide.

Sincerely,
Carlos Fernandes, CEO



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THE CONSTELL VALUES



Integrity

We exhibit ownership and transparency in everything we do. We respect everyone we associate with, and the products with which we work. We keep our word and abide by the policies and procedures that govern our industry.



Quality

We are committed to offering quality services, with strong attention to detail. We strive for industry-leading results, using the finest technology, and exceed our clients' expectations every time.



Agility

We provide customised solutions to our clients and encourage out-of-the-box thinking in our people to improve products and services. We adapt to change quickly and challenge the status quo.



People Centricity

We prioritise people's needs. We empower our people and respect their ideologies, perspectives and cultures. We lead by example.



Passion

We love what we do and are committed to transforming lives through our work. We are determined to never give up, come what may.

At Constell, we believe in creating value and transforming lives.

We do this by leveraging our shared skills and state-of-the-art technology in accordance with our values. These values form the guiding principles by which we work.

A woman in a grey blazer is focused on writing on a document at a desk. She is wearing a watch on her left wrist. The desk is cluttered with various items, including a microscope, a calculator, and several stacks of papers. The background is slightly blurred, showing a typical office environment.

COMPLIANCE WITH LAWS AND REGULATIONS

All employees, directors, and contractors of Constell Group must comply with all applicable laws, regulations, and industry standards governing the diamond industry in the countries in which we operate.

Constell commits to maintaining a comprehensive understanding of all relevant laws and regulations and ensuring that our operations are conducted in full compliance with them.

CONDUCTING BUSINESS ETHICALLY, WITH INTEGRITY, AND IN FAIRNESS

Ensuring that all business activities are conducted in an **honest, ethical, professional and accountable** manner is fundamental to our work.

Constell is committed to combating dishonesty and fraud in all business transactions in order to maintain and enhance consumer trust in, and the reputation of the diamond industry. We are committed to maintaining the highest standards of financial integrity for the benefit of all our stakeholders.

All accounting records, and reports produced from those records, must be maintained and presented according to the laws of each applicable jurisdiction.

Compliance with generally accepted accounting principles in the country where Constell is incorporated and Constell's system of internal controls is required at all times.

It is the responsibility of Constell to pursue its corporate value enhancement through sound business practices. Our business activities have direct and indirect impact on the societies in which we operate, and therefore sound business practice requires that business decisions give due consideration to the interests of stakeholders including shareholders, customers, employees, suppliers, business partners and local communities.

All employees must endeavour to conduct business accordingly. In making business decisions, employees must act on an informed basis, in good faith, and in the honest belief that the action taken is in the best interest of Constell.

Constell has put programmes in place that monitor the effectiveness of these commitments and support all workers in this endeavour.

RESPECT FOR HUMAN RIGHTS AND LABOUR STANDARDS

We recognise and respect the **fundamental human rights** of all individuals involved in our operations, including employees, suppliers, and local communities.

We will provide a **safe and healthy working environment** for our employees, ensuring compliance with applicable health and safety regulations.

We prohibit forced and child labour, as well as any form of discriminatory practices.

ENVIRONMENTAL RESPONSIBILITY



We are committed to **minimising our environmental footprint** and **promoting sustainable practices**.

Environmental laws and regulations will be followed, and efforts will be made to **conserve resources, reduce waste, and minimise pollution**.

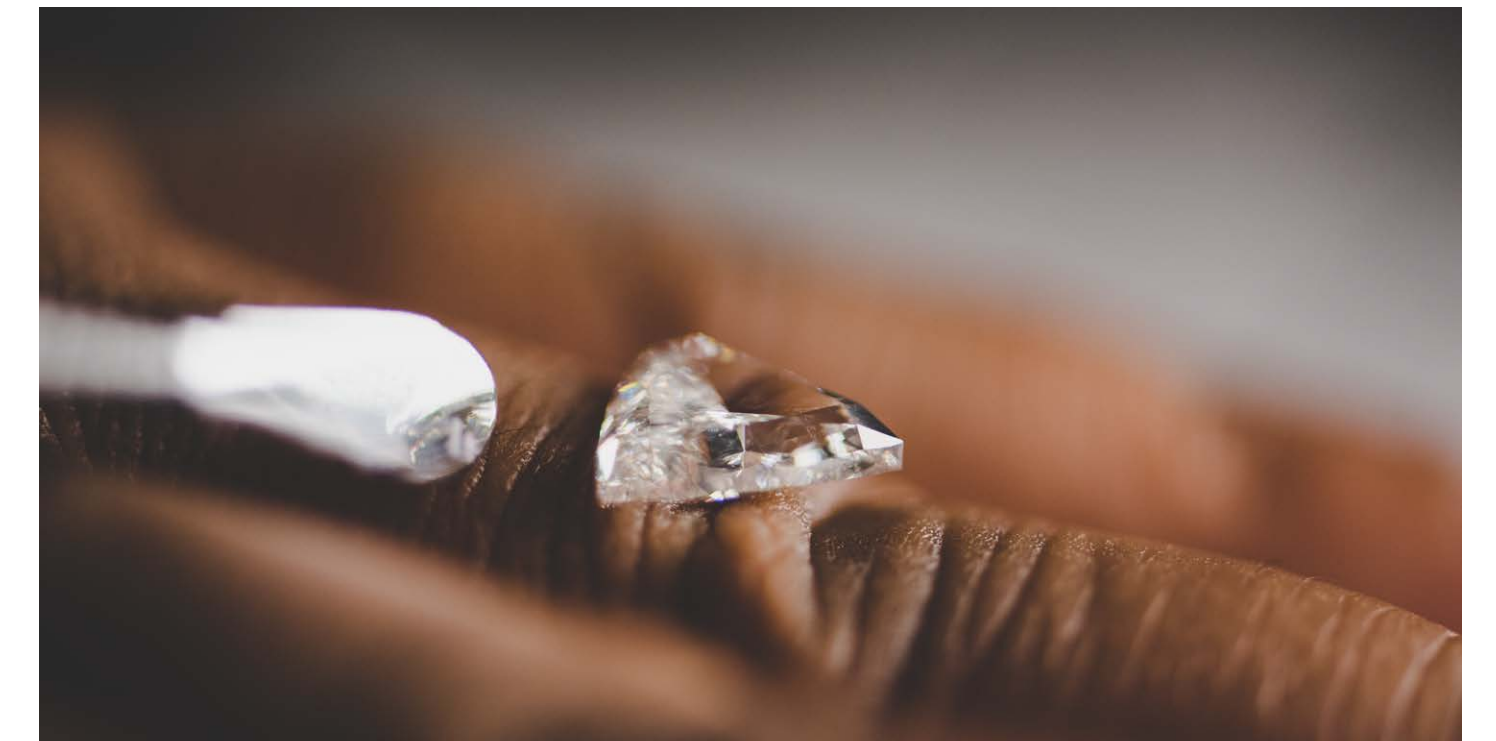
We will strive to support initiatives that contribute to the **protection of the natural environment**.

RESPONSIBLE SOURCING

We will ensure that all diamonds and raw materials used in our operations are sourced from **legal and ethical sources**.

Responsible sourcing practices, such as complying with the **Kimberley Process Certification Scheme**, will be followed to prevent the trade of conflict diamonds.

We will encourage our suppliers to adhere to the same responsible sourcing principles.



PRIVACY AND DATA PROTECTION

We will handle personal and sensitive data in accordance with applicable **data protection laws and regulations**.

We will respect and safeguard the **confidentiality and privacy** of customer, employee, and business information.

TRANSPARENCY AND ACCOUNTABILITY

We will maintain accurate and transparent records of our business activities, financial transactions, and compliance efforts.

Prompt disclosure of potential conflicts of interest is required, and appropriate steps will be taken to mitigate them.

REPORTING AND NON-RETALIATION

We will establish mechanisms for reporting potential violations of this Code of Conduct, including a **whistleblower policy**.

Individuals who report violations in good faith will be **protected against retaliation**, and their concerns will be promptly and thoroughly investigated.

TRAINING AND COMMUNICATION

We will provide **regular training and awareness programmes** to ensure that all employees understand and comply with this Code of Conduct.

Clear communication channels will be established to **promote dialogue, answer questions, and address concerns** related to ethical conduct.



UPHOLDING THE CODE

All employees, directors, and contractors of Constell are expected to read, understand, and uphold this Code of Conduct.

Failure to comply with this Code may result in disciplinary action, up to and including termination of employment or contractual relationship.

THANK YOU

This Code of Conduct outlines the rules and regulations governing our industry. However, we look to you, as a valued Constell team member, to uphold its contents in your day-to-day-work.

Thank you for your dedication to honouring and living the Constell values – it is thanks to each and every one of you that we can all be proud to be a part of Constell.

If you have any questions regarding our Code of Conduct, please contact our Compliance department: [\(insert relevant Constell email address\)](#).

Constell reserves the right to unilaterally modify this document at any time.



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