



SANCTIONS POLICY

Introduction

The global nature of our business, and because Sanctions apply across borders, means the transactions or activities we engage in may be subject to Sanctions or other Restrictive Measures imposed by multiple government authorities. This includes those of Switzerland, the European Union (EU) and/or the United States (US), amongst others.

Government authorities impose Restrictive Measures for a variety of national security and foreign policy reasons, either unilaterally, based on United Nations (UN) Security Council resolutions, or other multilateral policy initiatives.

Failure to address the risk of violations of these measures may undermine our reputation and lead to investigations, fines and/or other penalties for the company and/or individuals.

This Sanctions Policy sets out Diamond Couriers Ltd's approach to ensuring that we fully comply with all Sanctions, Export Controls and Trade Embargoes applicable to our business activities and that we appropriately manage associated risks.

Who does this apply to?

This policy applies to all employees, directors and officers, as well as contractors under Diamond Courier's direct supervision, working for a Diamond Courier's office or industrial asset directly or indirectly controlled or operated by Diamond Couriers Ltd.

We assert our influence over joint ventures we don't control or operate to encourage them to act in a manner consistent with the manner consistent with the intent of this policy.

What is our commitment?

We are committed to complying with all Sanctions imposed by the EU, Switzerland, the UN and US, even if these Sanctions do not apply to Diamond Courier's activity, because of its place of incorporation or where it carries out its business activities. We are also committed to complying with any other Sanctions and Restrictive Measures, applicable to our business activities.

We do not participate in transactions or engage in conduct designed or intended to evade or facilitate a breach of applicable Sanctions or other Restrictive Measures.

We do not conduct business in, or involving any, Embargoed Territory, or Sanctions Targets, directly or indirectly.

We do not engage in any sanctionable activity that could result in the designation of Diamond Courier Ltd as a Sanctions Target.

We require employees to be alert to Sanctions risk and to report any Sanctions issues identified to Compliance.

Speaking openly

We are each responsible for ensuring that we meet our commitments. We expect our employees and contractors to speak openly and raise concerns about possible breaches of the Code of Conduct and this policy with their manager, supervisor or via other available reporting channels. Our Raising

Concerns platform is available to employees, contractors and external parties. Diamond Couriers Ltd takes concerns seriously and handles them promptly. We have a zero tolerance for retaliation against anyone who speaks openly about conduct they believe is unethical, illegal or not in line with our Code of Conduct and policies, even if the concern isn't substantiated, as long as they have not knowingly made a false report.

Consequences

Our policies support our Values and Code of Conduct and reflect what is important to us. Diamond Couriers Ltd takes breaches of our policies seriously. Depending on the severity of the breach, consequences may range from a warning to termination of employment.