

Whistle-blower and Non-Retaliation Policy

Scope

All Diamondpick employees are expected to uphold this Policy. This includes all directors, officers, and employees worldwide as well as all Diamondpick business units and subsidiaries, and joint ventures over which Diamondpick has operational control.

The Policy covers the following - the list is indicative and not exhaustive:

- Fraud, corruption, or theft committed / avenues for such offences.
- Questionable accounting or auditing matters, internal controls, disclosure matters.
- Intentional concealment and/or fraudulent reporting of financial or other information to investors, shareholders, regulatory authorities and other stakeholders.
- Intentional process deviations.
- Misuse of company property and/or funds.
- Employee misconduct
- Environmental, health, and safety issues that could endanger employees/-public.
- Failure to comply with the law and/or the Company's set rules and regulations, including the Code of Conduct laid by the company.

Reporting Channels

Nothing in this Policy precludes any Associate from reporting a suspected violation of law to the government or from cooperating in any government investigation. If you have questions about how to do so, you may direct them to HR teams by mail to Dpdr@diamondpick.com.

Report a suspected violation of the Code of Ethics, Diamondpick policies, or law to Head HR by mail to gsiva@diamondpick.com

Retaliation

No employee who, in good faith, reports something or files a Protected Disclosure in line with this policy will face discrimination, retaliation, or unfavorable employment consequences. The Company forbids any kind of harassment, discrimination, or retribution against a whistleblower who, in the course of reporting what they reasonably believe to be one or more Reportable Matters that have occurred or are currently occurring.

Personnel who disclose information or make a protected disclosure in good faith and think they are being the subject of harassment, retaliation, or discrimination because they reported something under this policy must notify their manager or supervisor immediately. Should they, for whatever reason, feel uneasy discussing the issue with their manager, they ought to bring it up with the Head of HR.

Disciplinary Consequences

Diamondpick takes violations of this Policy, including protection from retaliation of those who make reports, very seriously. Violations could result in disciplinary action, up to and including termination (subject to local laws and regulations).

Decision & Reporting

The Head of HR would advise the CEO to take any appropriate disciplinary or corrective action if an inquiry reveals that an improper or unethical act has been performed. It is made clear that any disciplinary or corrective action taken against the Subject in response to the results of an investigation conducted in accordance with this Policy will follow the relevant staff conduct policies and disciplinary procedures, and the remedial action will be proportionate to the seriousness of the offense.

Additionally, while looking into potential Protected Disclosure violations, the Company may take reasonable and necessary steps to stop such violations from happening in the future. The Company may occasionally be required by law to forward complaints to the proper outside regulatory bodies.

The complainant has the right to report the incident to the proper external legal or authorities if they are not satisfied with the investigation's findings.

Document Archival

Subject to this Policy, the Company shall maintain records of all Protected Disclosures and reports. Any written submissions from the complainant, any additional company documents listed in the Protected Disclosure or determined by the company to be pertinent to the Protected Disclosure, a summary of the date and mode of the Protected Disclosure's receipt by the company, the investigation conducted, and any response from the company to the complainant shall be included in the documentation. The Company will keep all of these records for a minimum of three (3) years after the date the Protected Disclosure was received. As previously mentioned, confidentiality shall be upheld to the degree that is reasonably practical given the circumstances and nature of the investigation.

Review of the Policy

The Chief Executive Officer and Head of Human Resources are hereby authorized to implement any necessary modifications to the aforementioned policy as and when needed for the Company.

Policy Control Information

Policy Name: Whistle-blower and Non-Retaliation Policy

Revision Date: Oct 31, 2023

Policy Owner: Head HR

POC: Sivakumar Ganesan

Department: Human Resources

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