

Bribery and Facilitation Payments

Anti — Bribery and Facilitation policy

1. Policy statement

- o GLD Diamonds Ltd. is committed to full compliance with Anti-Bribery and Facilitation laws and regulations applicable in Israel including the guidelines issued by the local law enforcement authorities.
- o GLD Diamonds Ltd. recognizes the fact that all forms of bribery and facilitation: intimal, incoming and outgoing are of equal importance and should be fought.

2. Management and control of the top management of takes full

responsibility for the policy.

- o GLD Diamonds Ltd. will appoint Anti-Bribery and Facilitation compliance officers who will be responsible for the day-to-day operations concerning the implementation of regulatory requirements.
- o GLD Diamonds Ltd. accepts the standard of compliance as defined by The UK 2010 Bribery Act as its own standard of compliance. Of the recommendations, special emphasis will be put on recommendations which refer directly to companies dealing in precious metals and precious stones.
- o GLD Diamonds Ltd will apply the highest standard of diligence when handling transactions with a high level of financial sensitivity with clients and suppliers.
- o As Anti- Bribery and Facilitation policies are of global concern, GLD Diamonds Ltd. will update all operational policies and regulations on an annual basis or other if international law so requires.
- o All GLD Diamonds Ltd. staff will be trained on the importance and implementation of regulations concerning Anti-Bribery and Facilitation policy and all relevant legislation on anti-bribery.

Note: this policy is signed and filed in official GLD Diamonds Ltd. records after being communicated to all employees and is part of a set of policies presented to new employees.

Haim Giladi

Procedure to monitor compliance with Anti-Bribery and Facilitation policy

1. Objective

An instruction to accomplish compliance with the requirements of Anti-Bribery policies and all relevant legislation on anti-bribery and taking appropriate actions based on findings.

2. Terminology

Prevention of Corruption Performance Standards have been adopted to cover the following areas and should be read in conjunction with this procedure:

A — Gifts, entertainment and hospitality

B — Conflicts of interest

C — Facilitation payments D — Use of company assets

E — Political donations

F — Interactions with government officials and lobbying G — Charitable donations

H — Social and community investment and enterprise development activities I — Sponsorships

J — Retention and payment of intermediaries

Red Flag — event (action, statement or document) that might indicate money or gift transfer covering any financial abuse.

For the purpose of this procedure, corruption is defined as any act intended to result in the misuse of entrusted power for personal or corporate gain. Corruption encompasses a variety of situations including bribery, conflicts of interest, theft, extortion, embezzlement, fraud and misuse of company assets.

Bribery is defined as promising, offering or giving an undue advantage to a person or entity, either directly or through an intermediary, in order that the person or entity should perform, or refrain from performing, an act in breach of their business or public duties.

Common examples of bribery include:

O cash or other forms of payment to secure a contract or obtain a license

C] improper donations to political parties or related organizations; and □ excessive gifts or entertainment intended to influence the recipient to undertake a particular course of action.

For the purpose of this procedure, a bribe represents any thing of material value, not simply a payment of cash, and may include the provision or receipt of:

O lavish or disproportionate gifts and entertainment ☐ donations with an ulterior motive

C] payment of travel expenses or accommodation for a customer or official when there is no underlying business purpose for a trip; or

O use of corporate assets for activities which are unrelated to our business or approved charitable purposes.

Conflicts of interest can arise when financial or personal considerations may influence or appear to influence the judgment or actions of our employees in performing their duties or have the potential to do so. Such conflicts can occur when private and company interests are mixed or when business or governmental decisions are based on private interests.

Extortion is defined as the illegal use of an official position or powers to obtain property or funds.

Fraud can be defined as any deception deliberately practiced in order to secure unfair or illegal gain.

3. Means

A. In order to comply with the legal demands all following details of GLD Diamonds Ltd. clients must be verified and recorded. This has to be done for both new clients and for clients who have not been active for a period of at least one year. The following details are the minimum required and in some cases the authorities might demand more specific details of a certain client, in any case the identification must provide a more than reasonable chance that client is indeed identified.

3.1 full name

3.2 date of birth (for clients who are persons)

3.3 establishment date (for clients who are companies)

3.4 full address + mailing address

3.5 identification by any identifying document bearing a picture of the holder. (For clients who are persons)

3.6 company license from authorities (for clients who are companies)

Note: in case of doubt, it is advised that client shows more than one identification document in order to minimize chances of forgery.

B. In case of identification of new customers form FR 001 will be filled.

C. Identification of Red Flags

C1 "high risk" clients could be identified by their country of origin, the way they close deals, etc.

C2 a Red Flag indicates that there is an opportunity for a bribery or facilitation payment.

C3 Red Flags might include:

Provision of gifts and entertainment

C] requests for gifts or entertainment

O requests that gifts be sent to a private address, rather than the recipient's official/business address or that any such gifts not be disclosed ☐ requests for gifts or entertainment that are excessive in value

O the nature or value of the gift would be likely to embarrass the recipient or GLD Diamonds Ltd. if made public ☐ gifts are provided as a reward for past or future actions

D the gift is inappropriate, given the position and rank of the recipient ☐ gifts are given to spouses, partners, relatives or friends of the recipient ☐ attempts are made to conceal the nature or value of gifts, entertainment, travel or accommodation expenses by either the giver or the recipient.

Offers of gifts and entertainment from suppliers

Ü offers of gifts or entertainment received at a time when the relevant supplier contract is about to expire or is up for renewal ☐ frequent/repeated offers of hospitality/gifts from the same supplier ☐ offers of personal favours or other treatment of a preferential nature (for example, goods or services free of charge or at artificially reduced prices, holidays or other accommodation of any nature, payment of travelling costs, personal loans).

D. if during regulatory, self or any other assessment a Red Flag is identified and suspicions arise as to the whereabouts of the client, immediate consulting will take place with GLD Diamonds Ltd. manager who is responsible for all financial offenses affairs.

E. The Chief Executive Officer (or executive board) is responsible for seeing that the Program is carried out consistently with clear lines of authority.

F. if after an inquiry the suspicions are found to be grounded immediate reporting will be done to the Chief Executive Officer and these will be investigated and actioned appropriately.

G. The company makes clear that compliance with the Anti-Bribery and Facilitation policies and procedures is mandatory and that no employee will suffer demotion, penalty or other adverse consequences for refusing to pay bribes even if it may result in the enterprise losing business.

Haim Giladi

Anti-Bribery and Facilitation compliance officer appointment

29/05/2025

To: all GLD Diamonds Ltd. employees

Subject: appointment of Mr. Haim Giladi as Anti-Bribery and Facilitation compliance officer.

Dear Colleagues,

As of today, Mr. Haim Giladi accepted the responsibility as our Anti-Bribery and Facilitation compliance officer.

Main tasks:

1. Executing the company's policy on Anti-Bribery and Facilitation as described in document Anti-Bribery and Facilitation policy
2. Defining a procedure to identify and verify supplier's and client's identity
3. Controlling and if necessary, stopping financial transactions at an early stage.
4. Instructing and guiding sales, finance and purchasing employees.
5. Making sure that everyone in our business and our business partners know our principles..
6. Serve as a Point of Contact to all employees with regard to their suspicions of RED Flag situations.

Haim Giladi

Gift Register.

Date	Received from	Given to	Item description	Approximate value	Comments

Haim Giladi