

NCC Code of Ethics

Value	Article	Description
Integrity <i>Being honest and ethical</i>	Avoiding conflict of interest	Conflicts of interest occur when we prioritize personal, social, financial or political interests over those of the company. Board members and employees alike have a responsibility to avoid situations that create even the appearance of a conflict of interest between them and the company. A conflict of interest with NCC cannot be created, be it directly or indirectly.
	Insider trading and the use of non-public information are prohibited	In the course of our work, we may come in contact with non-public, material information about the company, its clients, or business partners. We are barred from providing "inside information" or "tips" to anyone else in order to enable them to profit from this information. This proscription is valid everywhere, regardless of where we or the individual receiving the information reside. Information is considered non-public information if it has not been made public through the acceptable channels.
	Unfair competition and business intelligence	Fair business practices: It is important that we maintain a reputation of an ethical company that operates fairly. We are not trying to get information belonging or pertaining to our competitors by any illegal or unfair ways. Therefore, it is forbidden to steal information or possess trade secrets obtained without the owner's consent, or solicit employees or former employees of other companies to disclose such information.
	Preventing corruption	We forbid all bribery and corruption. None of us or those representing us may offer bribes, commissions, or any other inappropriate fee. We are further barred from offering, or give the impression of offering, anything of value with aim of securing business deal, unfairly influence decisions, or obtain an unfair business advantage.
	Marketing materials and the transfer of professional information	Our professional operations with individuals in the fields of cutting, polishing, and diamond setting are designed to ensure and improve convenient access to relevant information. These operations include promoting research and enrich knowledge in these fields, improving professional practices, promoting our services, and receiving the necessary feedback. We use a variety of communication channels to provide information, and we must provide complete and accurate information, in appropriate ways, in each of

		these channels.
	Political activities and contributions to government officials	We respect the right our executives and employees to participate in the political activities of their choice. Any suggestion for contributions or political activities by the company should be referred to the company's CEO for review and approval.
	Money laundering is prohibited	<p>Money laundering involves disguising funds from criminal activity or terrorist organizations, so that illegal or "dirty" money is deemed legal, or "clean."</p> <ul style="list-style-type: none"> • We conduct business only with clients who provide us with information that allows us to know whether payments made as part of a transaction are appropriate. • We do not pay or receive payments from elements that are non-party to the transaction, or who are not legally entitled to receive or give payments. • We do not accept cash payments, unless cleared to do so by the CEO in advance.
<p>Respect <i>Maintaining a positive attitude toward our employees and stakeholders</i></p>	Equal opportunity employment	NCC recognizes the value of diversity in the background, skills, and abilities its employees bring. We employ people with integrity and discretion, who we trust to act responsibly. We are committed to promoting workforce diversity and develop all existing talents within our organization.
	Maintaining health and safety in the workplace	<p>NCC looks out for its employees' safety and takes the issue of workplace health and safety, and that of the public, with all due seriousness in all its activities. We constantly strive to improve safety and to implement a safety-oriented corporate culture.</p> <p>Our goal is to prevent accidents in the workplace by strict compliance with safety procedures. Each of us is responsible to maintain a safe and healthy work environment, so we can all benefit.</p>
	Preventing workplace harassment	<p>Workplace harassment means any physical or verbal action that creates an offensive, hostile, or intimidating working environment.</p> <ul style="list-style-type: none"> • NCC prohibits harassment of any type, be it verbal or by actions or behavior, which creates an offensive, hostile, or intimidating work environment. Such behavior is forbidden and we will not tolerate any kind of harassment.

		<ul style="list-style-type: none"> • We refrain from making offensive comments or jokes, or presenting materials mocking classes that are protected by law over age, gender, race, ethnicity, nationality, religion, sexual orientation, disability, etc. • We do not use language that includes sexual innuendo, and we do not send e-mail messages of a sexual nature. • We encourage employees to immediately report any offensive or threatening behavior, be it verbal or physical.
	Avoiding the use of banned substances; avoiding workplace violence	<ul style="list-style-type: none"> • Do not possess, use, sell or purchase illegal drugs, at work or at leisure, on or off any complex, site or facility operated by NCC. • Any kind of violence in the workplace is strictly forbidden, including acts of violence or threats of violence against another person; malicious damage to company property or employees' property; or conduct that compromises the safety of others. Any and all such activity is barred, and will not be enabled. • We do not buy, sell, possess or use illegal drugs or substances, and we do not create a safety hazard due to the use of drugs or alcohol while in the workplace. • We do not bring firearms, explosives, or hazardous materials to the workplace, unless we have received explicit authorization. • We encourage employees to immediately report any offensive, threatening, or violent behavior, be it verbal or physical.
Collaboration <i>Working together with a sense of shared</i>	Collaboration and support in the workplace	We are committed to a supportive work environment based on collaboration, where our employees work together to achieve the company's goals. We allocate resources for the good of the company, and provide support systems, tools, and organizational processes and infrastructure to enhance collaboration within the company.
	Contracting business partners	We choose the services and contracts that best contribute to NCC in the long-run: We select our suppliers according to price, quality, availability, service, reputation, environmental practices, ethics, and business practices.
	Protecting third-party intellectual property	<ul style="list-style-type: none"> • We maintain the confidentiality of third-party information as if it was our own. • We do not use third-party copyrighted materials

<p><i>responsibility for achieving our common goal, both within the organization and in our relationships with our stakeholders</i></p>		<p>before obtaining prior permission from the copyrights' holders.</p> <ul style="list-style-type: none"> • We respect the intellectual property and information of our business partners and make sure we have the necessary permission to use it. • Some of us came to NCC from other companies, and some of us will leave NCC for other companies. In the event that we leave NCC, we cannot take confidential information with us, or disclose it to a new employer. We also cannot disclose a former employer's confidential information to NCC.
	<p>Sharing information with the media and the general public</p>	<ul style="list-style-type: none"> • We do not discuss company business with the public or the media, unless asked to do so in the line of duty, and subject to NCC's communications policy. • We consult with the CEO prior to making any information pertaining to the company public, and prior to engaging with the media, giving interviews, or participating in events where the media will be present. • We consult with the CEO whenever we learn of an event or activity that may be of interest to the media or to the company's management.
	<p>Social media</p>	<ul style="list-style-type: none"> • We exercise caution and discretion, and consider the potential results of our social media use. • We are open and honest with regard to our link to NCC when this information is relevant to the issue at hand. • When sharing our employment by NCC, we underscore the fact that the ideas and opinions presented are our own, and may not represent the company's positions. • We do not use social media to discuss matters pertaining to proprietary and classified NCC information. • We comply with the rules and guidelines involving the marketing and promotion of products and services in all social media platforms NCC sponsors.