Metalor Technologies SA

La Tène (Switzerland)

Independent Reasonable Assurance Report on Refiner's Responsible Sourcing Compliance Report and Country of Origin Report

Responsible PGM Guidance

For the year ended 31 December 2025

Independent Reasonable Assurance Report to the Board of Directors of Metalor Technologies SA, La Tène, Switzerland

Scope of the Assurance Engagement

We have performed an independent reasonable assurance engagement on Metalor Technologies SA's Responsible PGM Compliance Report ("Compliance Report") and the Country of Origin Form ("COO Form") for the reporting period from 1st January 2025 to 31 December 2025.

Subject Matter of the Assurance Engagement

The subject matter includes the description on the Metalor Technologies SA's precious metals responsible sourcing policies, procedures, governance, management systems, and key performance information contained in the Refiner's Compliance Report and whether this has been prepared in accordance with the reporting criteria.

Reporting criteria against which assurance is performed

The reporting criteria ("the Criteria") comprises the LPPM's Responsible Sourcing Guidance including: the **Responsible PGM Guidance,** applied through the Refiner's detailed Metalor Group precious metal supply chain policy available on Metalor's website **www.metalor.com**.

Our opinion

Reasonable assurance opinion

In our opinion, Metalor Technologies SA's Compliance Report and the COO Form for the period from 1st January 2025 to 31 December 2025, in all material respects, describe fairly the activities undertaken during the year to demonstrate compliance, and management's overall conclusion contained therein, is in accordance with the requirements of the *Responsible PGM Guidance*.

Basis for our opinion

We conducted our engagement in accordance with *International Standard on Assurance Engagements (ISAE) 3000 (Revised), Assurance Engagements Other Than Audits or Reviews of Historical Financial Information* issued by the International Auditing and Assurance Standards Board (IAASB) and the **LPPM Third Party Audit Guidance version 4**. Our responsibilities under this standard are further described in the "Our responsibilities" section of our report.

We believe that the evidence we have obtained is sufficient and appropriate to provide a basis for our reasonable assurance opinion.

Independence and Quality Statement

We have complied with the independence and other ethical requirements of the International Code of Ethics for Professional Accountants (including International Independence Standards) issued by the International Ethics Standards Board for Accountants (IESBA).

Our firm applies International Standard on Quality Management (ISQM) 1, *Quality Management for Firms that Perform Audits or Reviews of Financial Statements, or Other Assurance or Related Services Engagements*, issued by the IAASB. This standard requires the firm to design, implement and operate a system of quality management, including policies or procedures regarding compliance with ethical requirements, professional standards and applicable legal and regulatory requirements.

Refiner's Responsibilities

The Management is responsible for the preparation and presentation of the Refiner's Compliance Report and the COO Form in accordance with the Criteria and free from material misstatements, whether due to fraud or error.

This responsibility includes establishing appropriate risk management and internal controls from which the reported information is derived and maintaining adequate records and assurance trails.

The Management is also responsible for determining the appropriateness of the Criteria in view of the intended users of the Report and for ensuring that the Criteria remains publicly available to the Assurance Report users.

Our responsibilities

We are responsible for:

- planning and performing the engagement to obtain reasonable assurance about whether the Refiner's Compliance Report and COO Form is free from material misstatement, whether due to fraud or error;
- forming an independent opinion, based on the procedures we have performed and the evidence we have obtained; and
- reporting our opinion to the Management.

Summary of the work we performed as the basis for our opinion

We exercised professional judgment and maintained professional skepticism throughout the engagement. We designed and performed our procedures to obtain evidence about the Refiner's Compliance Report and COO Form that is sufficient and appropriate to provide a basis for our opinion. The nature, timing, and extent of the procedures selected depended on our judgment, including an assessment of the risks of material misstatement of the Refiner's Compliance Report and COO Form, whether due to fraud or error.

We identified and assessed the risks of material misstatement through understanding the Refiner's Compliance Report and the engagement circumstances. We also obtained an understanding of the internal control relevant to the Refiner's Compliance Report and COO Form to design procedures that are appropriate in the circumstances but not for the purpose of expressing an opinion on the effectiveness of internal controls.

Our procedures include:

- **Suitability of Criteria:** reviewing the Refiner's supply chain due diligence policies and standard operating procedure documentation to determine conformance with the Responsible PGM Guidance.
- **Business Understanding**: interviewing key management and senior executives to evaluate the Refiner's governance and internal control environment against the Criteria.
- **Process Understanding:**
    - critically evaluating the Refiner's supply chain risk identification, classification and mitigation processes and systems based on the Criteria and our experience and understanding of risks in the precious metals supply chains.
    - reviewing documentation and performing walkthroughs of identified key processes and controls to corroborate information provided by management.
- **Detailed Testing:**
    - conducting analytical reviews and trend analyses of transaction volumes and country of origin data and reviewing management responses for any material anomalies.
    - designing a sample selection methodology to obtain sufficient, appropriate coverage of precious metals supply chains, including new and existing suppliers, different types of material and risk classification categories, and transactions in the reporting period.
    - for the sample selected reviewing suppliers know your counterparty and due diligence files to assess completion and accurate classification against the Criteria.
    - for the sample selected reviewing details of transactions (for example volumes, assays and transportation routes) against supporting documentation and corroboration to supplier files.
    - checking total volume on the COO Report to the Refiner's procurement systems.
    - confirming data is reported in correct units (kgs)
    - conducting analytical reviews and trend analyses of country of origin data and reviewing management responses for any material changes in sourcing.
    - confirming appropriate type of material classification per the Criteria for a sample of transactions
- **Disclosure Review:**
    - reviewing the completeness of Refiner's Compliance Report against the applicable Criteria (Disclosure Guidance version 3).
    - evaluating the assertions in the Refiner's Compliance Report based on our overall knowledge and understanding of Refiner's internal controls and supply chain due diligence processes, systems and results.

Inherent limitations and restriction of liability

Non-financial information, such as that included in the Refiner's Compliance Report and COO Form, is subject to more inherent limitations than financial information, given the more qualitative characteristics of the subject matter and the methods used for determining such information.

Intended use or purpose / Restriction on use or distribution

This report has been prepared for the Management of Metalor Technologies SA's for the purpose of determining whether Metalor Technologies SA's conforms to the Responsible PGM Guidance, in accordance with the terms of our engagement. We understand that the Report will also be shared with the LPPM to demonstrate the Refiner's conformance with the Criteria. We consent to this on the understanding that the Assurance Report may only be used by the LPPM for this and no other purpose. We do not accept or assume responsibility to anyone other than the Refiner for our work, or for the conclusions we have reached in the assurance report.

Geneva, 23 March 2026

Forvis Mazars SA

Franck Paucod
Lead Approved Assurance Provider
(Auditor in charge)

Tatiana Gomes
Approved Assurance Provider

Enclosures:

- Metalor Technologies SA's Compliance Report 2025

Copy to London Platinum and Palladium Market

METALOR®

Refiner's name	Metalor Technologies SA ("Metalor")
Refinery Location	Route des Perveuils 8, 2074 Marin-Epagnier, Switzerland
Reporting year-end	31.12.2025

Senior Management responsible for this report: Marco Pisino Group Quality and Sustainability Manager

Since its establishment in 1852, Metalor Technologies SA has earned a strong reputation among its global business partners as a company committed to ethical and responsible precious metals refining. As the world's largest multi-site precious metal refiner, Metalor is also a key player in the refining and production of silver, platinum, and palladium. This success is built upon unwavering business integrity and a robust corporate ethical framework. Honesty and transparency are at the heart of Metalor's corporate culture, and we remain steadfast in upholding and reinforcing these values across all levels of the company, both internally and externally.

Metalor core competencies are the refining, management and transformation of precious metals, the supply of innovative surface treatment processes, powders, chemical products and catalysts, and the manufacturing of silver alloys electrical contacts designed for electrical distribution, digital and analogue control, transports and electrical appliances. Metalor's primary objective is to create exceptional value for its customers, partners and shareholders, within a culture of performance, innovation, trust and respect. With subsidiaries all over the world, and around 1,655 employees, the Metalor Group is present in Europe, Americas and Asia.

Metalor has implemented the LPPM Responsible Sourcing Programme version 5 (the "Programme") and the OECD Guidance on all precious metals sourced. As the Company fully complies and is audited for its compliance with the OECD Guidance, , we are exempted from the similar due diligence and reporting obligations relating to minerals and precious metals from conflict affected and high-risk area of the Swiss Ordinance on Due Diligence and Transparency in relation to Minerals and Metals from Conflict-Affected Areas and Child Labour (DDTrO) (Art. 9 DDTrO). Regarding child labour, we comply with the due diligence and reporting requirement of the DDTrO.

The Company is subject to the Swiss Anti Money Laundering Act and the Swiss Precious Metal Control Act. As such, we are audited by the Swiss Precious Metal Control Office on a yearly basis to assess our compliance with the Swiss AML regulation, including processes and due diligence carried out as well as monitoring of relationships and transactions.

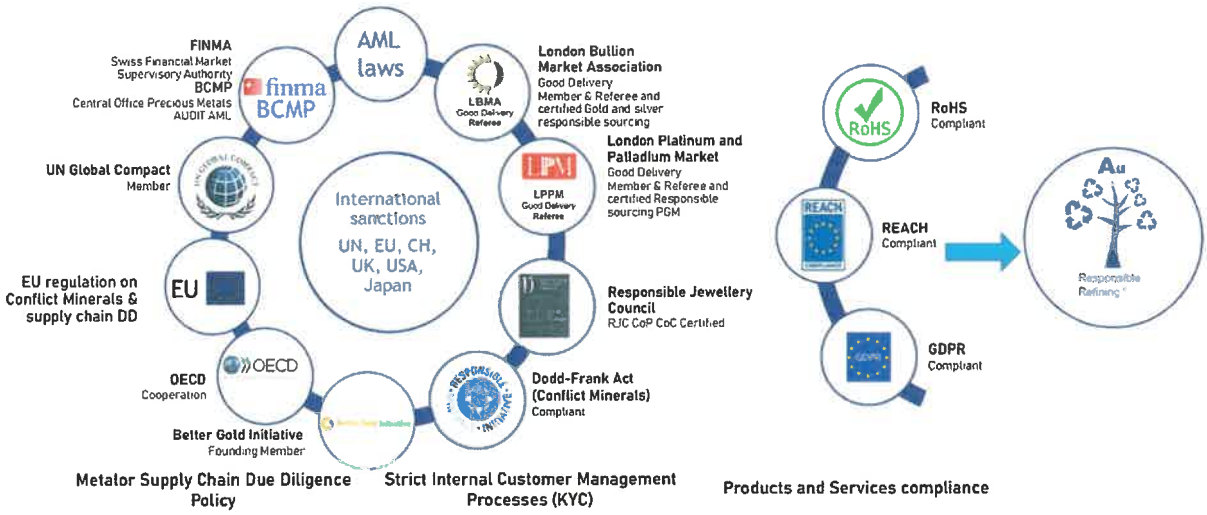
Metalor is a very active member of the London Platinum & Palladium Market Association (LPPM). It is a Full Member (the highest level of membership), registered on the Platinum and Palladium Good Delivery Lists, and one of the six referees worldwide for the association. Metalor is also a very active member of the London Bullion Market Association (LBMA) and also serves as one of the seven worldwide referees for that association.

We source more than 99% of our platinum and more than 95% of our palladium from recycled supply chains. We do not receive mined material in the form of dore, the remaining share comes exclusively from by-products, such as concentrated by-products generated during industrial processes. These Business Partners are located in North America, Australia and South Africa.

For recycled materials, we mainly source from industrial companies, manufacturers, precious metal wholesalers and dealers, as well as banks, primarily located in Europe, North America, Australia and Asia.

Compliance with the LPPM Responsible Sourcing Programme version 5 (the "Programme") and OECD Guidance is integral to our broader ESG strategy and reflects our commitment to maintaining and advancing industry standards. These frameworks enable us to minimize negative impacts while enhancing positive contributions throughout our operations and supply chain, delivering benefits to stakeholders worldwide.

Compliant Business Practices



Metalor Technologies SA evaluation

Step 1: Establish strong company management systems

Responsible sourcing policy

Our Supply Chain Due Diligence Policy is fully aligned with the framework set out in Annex II of the OECD Guidance. This policy formalises our commitment to establishing robust company management systems to:

- Prevent risks of significant adverse impacts that may be associated with the extraction, trading, handling, and export of minerals, as specified in Annex II of the OECD Guidance; specifically, risks related to conflict financing, contribution to serious human rights abuses, mineral fraud, and money laundering.
- Mitigate a broader range of risks, including environmental, social, and governance (ESG) risks (see Step 2).
- Prohibit, both within our group and throughout our precious metals supply chain, the employment of children, in strict accordance with ILO Convention 138.
- Adhere rigorously to all applicable local and international sanctions, including those issued by Switzerland, the United Nations, the European Union, the United Kingdom, and the United States.
- Ensure that all payments for precious metals are sent and received exclusively through official banking channels.

The Supply Chain Due Diligence Policy is communicated to all employees and are readily accessible via our Intranet. The Supply Chain Due Diligence Policy applies to all entities within our group and has been formally approved by the Compliance Committee. The policy is reviewed regularly typically on an annual basis to ensure it remains aligned with evolving social, regulatory, and other relevant developments.

Our Supply Chain Due Diligence Policy is also published in English on our corporate website and is included in the Due Diligence Packs provided to our precious metals counterparties as part of our onboarding process.

To ensure effective implementation, all relevant employees receive annual training on key compliance obligations, including anti-money laundering (AML) and financing of terrorism combating (CFT) measures. Special attention is given to staff in reception, evaluation, and front office roles, who are trained to identify suspicious materials and transactions.

Customer files, including all due diligence and risk identification information, are maintained by the Legal & Compliance Department. These files are strictly confidential and are shared only on a need-to-know basis or with governmental authorities as required by law.

Training

The training program is a key component of our responsible sourcing framework and includes both in-person and virtual sessions, delivered internally or by external experts. During the year, the Compliance Team organized five dedicated training sessions on responsible sourcing, in order for employees to better identify and assess anti-money

laundering (AML) and responsible sourcing risks. The program was further enhanced by a session led by the Swiss Association of Manufacturers and Traders in Precious Metals (ASMP), focusing on AML and responsible sourcing topics.

All 64 employees required to participate completed at least one training session. Notably, members of the Compliance Committee also attended the ASMP session, underscoring the importance of these initiatives at every level of the organization.

To maintain and strengthen expertise, all members of the Compliance Team attended at least one external seminar on responsible sourcing or AML. In addition, Metalor ensured participation in the OECD Forum on Responsible Mineral Supply Chains (May 2025).

2. Has the refiner set up an internal management structure to support supply chain due diligence?

Metalor has established a robust internal management system to support its supply chain due diligence, with the Legal & Compliance function at its core. This function is responsible for developing, implementing, and overseeing rules and processes across the organization to ensure compliance and operational effectiveness. Our requirements in terms of Due Diligence are publicly communicated through our Website and our CSR report.

The Compliance Committee comprising the CEO, CFO, and Group General Counsel who are also members of the Board of Directors of Metalor Technologies International SA, holds ultimate worldwide authority over the onboarding of new prospects and the continuation of business relationships with existing customers. Decisions within the Committee require unanimity. The Group General Counsel, who leads the Legal & Compliance function, manages ongoing monitoring activities and escalates matters to the Compliance Committee as necessary.

The management system clearly defines governance structures, roles, and responsibilities, and includes internal audit procedures as well as mechanisms for effective communication and management review in line with the adopted policy. Compliance Officers, located in the USA, Asia, and Europe, are responsible for implementing, supervising, and reviewing the due diligence process under the supervision of the Group General Counsel.

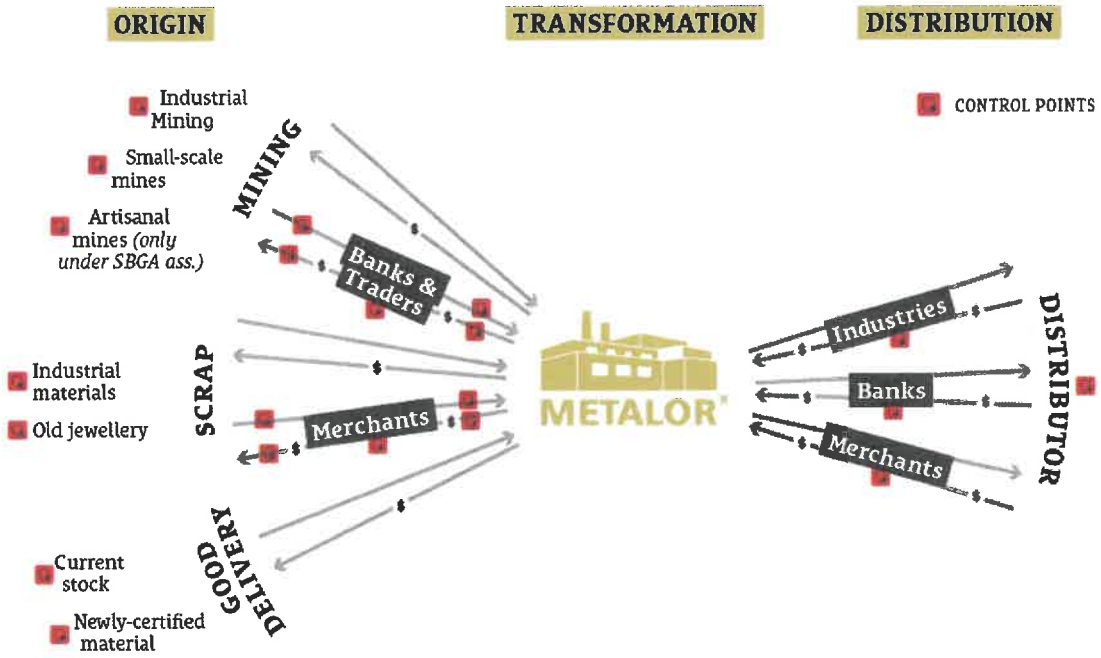
Each prospect must undergo Metalor's standardized account opening procedure, which collects all legally required information about the company, its operations, and the origin and supply chain of the precious metals entrusted to Metalor. The due diligence and compliance system is global and applies uniformly, regardless of the prospect's location.

3 System of transparency, information collection and control over the precious metal supply chain due diligence

Any material due diligence issues identified during the course of a business relationship are escalated to the Compliance Committee, as appropriate.

In 2025, no material violations of the internal due diligence process were identified or escalated, and no internal sanctions were reported. Due diligence in accordance with LPPM and LBMA responsible sourcing standards and OECD Guidance was conducted for all counterparties, with no exceptions reported during 2025.

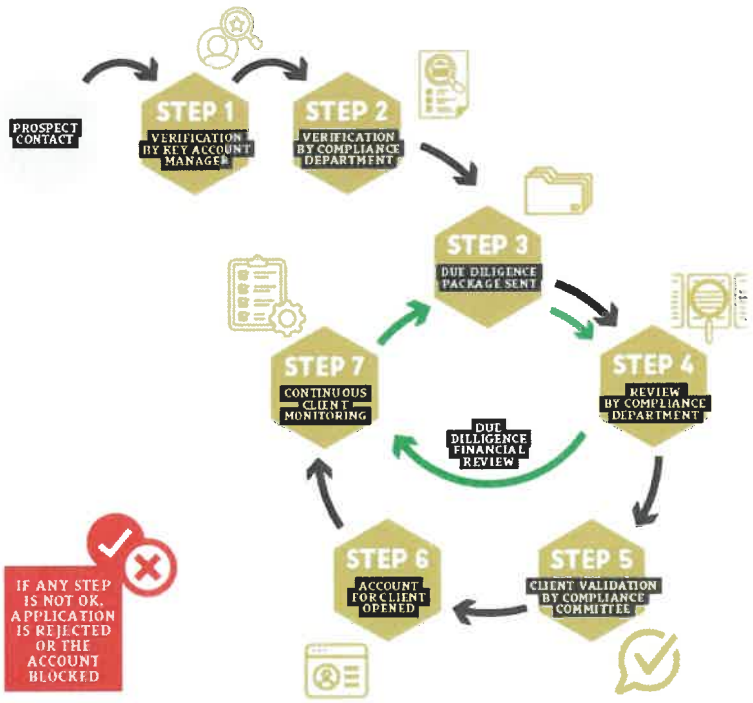
The value chain in the precious metal sector



Due diligence

Risk-based supply chain due diligence is performed before entering into a business relationship and on an on-going basis with any precious metals supplying counterparty in order to identify and assess the risks described above. Due diligence procedures conducted are different based on the type of supply chain (large scale mine / ASM / recycled precious metal) and the type of counterparty (listed group, small private companies). All our counterparties, their authorized signatories and ultimate beneficial owners are also screened at onboarding and on a daily basis against external databases.

Precious metal business partner onboarding process



Metalor has established a comprehensive process to support due diligence across its precious metals supply chain. This process is built on several key components:

- Due Diligence Packs: these are regularly reviewed and updated to ensure they remain effective and responsive to changing circumstances.
- Structured Onboarding and Approval Procedures: the onboarding of new counterparties follows a formalized checklist of required documentation and a multi-step approval process. Once the due diligence is completed and any necessary clarifications are obtained, approval is submitted to the decision of the Compliance Committee.
- Automated Counterparty Screening: all counterparties, authorized signatories, and ultimate beneficial owners are screened daily against WorldCheck. Any potential matches are promptly reviewed by the Compliance Team which takes necessary follow-up actions.
- Traceability System: each step of the process, from the receipt of material to the completion of refining, is documented. Every lot sent for melting or refining is assigned a unique identification number, and comprehensive supply chain information is recorded, including:
    - → Counterparty and supply chain risk level
    - → Country of origin of precious metal
    - → Type and subcategory of material (e.g., mined, recycled, large-scale mine, ASM, bullion, jewellery, industrial or electronic waste)
    - → Date of receipt, purity, and weight
    - → Shipping documents (airwaybills, bills of lading, packing lists, pro-forma invoices, import/export forms)
    - → Photographs taken at reception
    - → Assay and refining finalization

Scenarios are predefined in the system, such as discrepancies in weight or purity, and alerts are generated accordingly. These alerts are reviewed and analyzed by the relevant teams.

In most cases, Metalor manages the transport of materials from the source, further enhancing traceability and control over the supply chain.

ERP System Controls: the ERP system, which manages master data, requires approval from Compliance for the creation of any new counterparty. Any changes to key counterparty information in the ERP also require the Legal & Compliance Department approval.

This comprehensive process ensures robust monitoring, transparency, and control throughout the precious metals supply chain, in line with Metalor's commitment to responsible sourcing.

Record Keeping

Following the termination of a business relationship or the completion of a transaction, all supply chain and transaction records are retained for a period of at least 10 years, in accordance with regulatory requirements.

Payment Through Banking Channels

Metalor strictly prohibits all cash transactions, regardless of the amount. All payments whether in currency or precious metals must be executed exclusively through international banking channels. The company also enforces a policy restricting the execution or receipt of third-party payments. Standard settlement instructions are pre-approved by the Legal & Compliance Department before final approval in the ERP system by the Treasury Team, ensuring full compliance with this policy. Metalor requires its customers to provide (a) bank account(s) in the country where they are located and/or where they operate. This information is checked based on our Standard Settlement Instructions (SSI) Form.

Engagement with Precious Metal Suppliers and Stakeholders

Metalor is committed to establishing long-term relationships built on trust and mutual transparency. When sourcing from large or medium-scale industrial mines, Metalor sources directly from the mine, even when the commercial transaction is carried out through a trader. This approach ensures direct access to key stakeholders and strengthens the due diligence process. It also facilitates the verification of origin and the identification of all counterparties throughout the supply chain.

In such situations, Metalor conducts due diligence not only on the intermediary (trader) but also directly on the mine of origin. This includes conducting a site visit to the mine, in line with our risk-based approach and LPPM requirements, to confirm responsible practices and ensure the integrity of the supply chain.

In the case of artisanal mining (ASM), sourcing may occur through aggregators due to volume constraints. Enhanced due diligence is carried out on both the aggregators and the ASM

operations, including on-site assessments whenever feasible and appropriate based on the level of risk.

Responsible supply chain expectations are an integral part of the Due Diligence Pack provided during customer onboarding. This documentation specifically references and incorporates the policy outlined in Annex II of the OECD Guidance as well. Our counterparties are required to fully adhere to these expectations, including by: 1) conducting their business within a culture of honesty and opposition to fraud and corruption; 2) maintaining high moral, ethical, governance and social standards in their business and activities; 3) conducting their activities in compliance with applicable environmental, health, safety and labour regulations wherever they operate, and requiring their customers and suppliers to do the same; and 4) maintaining proper business relationships with all customers and suppliers.

Where possible, Metalor assists counterparties and prospects in improving their responsible supply chain practices. Relationship Managers, who receive regular training, are responsible for promoting responsible sourcing practices throughout the supply chain. During on-site visits, they explain the regulatory environment, company expectations, industry best practices, and provide guidance to counterparties, encouraging continuous improvement.

For counterparties that are intermediate refineries (non-LPPM/LBMA Good Delivery refineries), Metalor requires their participation in an industry program adhering to the OECD Guidance. Counterparties sourcing from these intermediate refineries are also required to obtain an audit of the refinery demonstrating compliance with OECD-equivalent standards if they wished to supply such materials to us.

To further strengthen industry practices, in 2025 Metalor actively participated in several key industry working groups and initiatives. These included LBMA working groups focused on strategic matters like transparency and further development to the RGG, as well as regulatory working groups organized by ASMP Additionally, Metalor contributed to ISO working groups dedicated to the development of standards definitions for precious metals.

Our engagement also extends to regular interactions with various non-governmental organizations (NGOs), reflecting our commitment to continuous improvement and collaboration across the sector.

Cooperation with government authorities

Metalor maintains a strong commitment to cooperating with all relevant authorities. As a regulated operating y under the supervision of the Swiss Precious Metal Control Office, we operate in fully compliance with the requirements of the relevant regulatory framework.

Payment to Governments

During the reporting period, we have not made payment to Governments or state-owned entities located in EITI member countries related to the purchase of mined precious metal sourced from them.

Grievance mechanism

Metalor has implemented a comprehensive grievance mechanism across the organization, enabling all employees and external parties to confidentially report concerns related to the precious metals supply chain, conflict minerals sourcing, or any other compliance issues (Whistleblowing Policy). This communication channel is managed independently and exclusively by the Group General Counsel.

To enhance accessibility and traceability, a dedicated functional mailbox has been established, which is escalating grievances to the Group General Counsel and compliance officers worldwide. The grievance mechanism allows for anonymous submissions by both employees and external parties. The Metalor grievance line is accessible via our website: https://metalor.com/corporate-social-responsibility/grievance/.

Only necessary information is communicated in an appropriate and timely manner, and in compliance with the principles of confidentiality, in order to enable the individuals concerned to understand the nature of the alleged facts, to provide their observations, and, where applicable, to contribute to the review and resolution process of the grievance.

Upon receipt of a report, the Legal & Compliance Department assesses the case before any potential escalation to the Compliance Committee.

The allegations or enquiries we have received in 2025 are the following:

In 2025, we received one allegation through our online grievance line regarding a suspected fraud involving one of our clients in Europe Following this notification, we immediately took appropriate actions including notably:

- directly contacting the client to obtain additional information and clarify the facts;
- conducting an in-depth verification via World-Check Screening and other compliance databases.

After completing all these investigations, no irregularities were identified. We therefore confirmed the continuation of our collaboration with this client and closed the case in 2025.

Step 2: Identify and assess risks in the supply chain

Metalor has fully complied with Step 2: Identify and assess risks in the supply chain.

Risks identification

Metalor conducts comprehensive risk identification and assessment across its supply chain. As part of our due diligence process, we evaluate the following risk categories:

- Severe human rights abuses linked to the extraction, transport, or trade of precious metals, including the worst forms of child labor, torture, inhuman or degrading treatment, widespread sexual violence, forced or compulsory labor, war crimes, crimes against humanity, or genocide.
- Direct or indirect support to illegitimate non-state armed groups or public/private security forces that illegally control mine sites, traders, intermediaries, transport routes, or impose illegal taxation or extortion within the supply chain.
- Child labor in any form.
- Bribery and fraudulent misrepresentation of the origin of precious metals.
- Failure to comply with taxes, fees, and royalties owed to governments related to mineral extraction, trade, or export from conflict-affected and high-risk areas.
- Money laundering or terrorist financing.
- Contribution to armed conflict.
- Sourcing from illegal mining operations.
- Non-compliance with environmental, health & safety, and labor regulations in the country of operation within the primary supply chain.
- Adverse ESG impacts in the primary supply chain.

We apply a risk-based approach to due diligence, using clearly defined criteria for high-risk categories and systematically implementing them across all precious metal suppliers. A risk assessment is conducted prior to establishing any business relationship to determine the counterparty's risk classification.

Supply chains may be classified as high-risk based on notably:

- Location risk (operating in conflict-affected or high-risk areas),
- Product risk, or
- Counterparty profile risk.

To identify high-risk areas, we rely on credible external data and indexes, which are reviewed and updated annually.

Location Risk Indicators

- FATF GAFI (Financial Action Task Force) lists,
- EU CAHRAs (Conflict-Affected and High-Risk Areas),
- Heidelberg Conflict Barometer,
- Section 1502 of the Dodd-Frank Act,
- UN-identified conflict gold transit zones,
- OECD List of Fragile and Conflict-Affected States Index,
- Transparency International – Corruption Perceptions Index (link),

Counterparty Risk Factors

- Refinery not accredited by LPPM or LBMA,
- Unexplained geographic routing within the supply chain,
- High-risk business profile,
- Offshore company structure,
- Sourcing from Conflict-Affected and High-Risk Areas (CAHRA),
- Involvement of Politically Exposed Persons (PEPs).

All relevant information relating to the above-mentioned risk factors for each customer is collected through the applicable KYC questionnaire as part of our due diligence process. This information is reviewed and analysed by the Compliance Officer and forms the basis for the assessment of the customer's risk level. For full details on the due diligence documentation, please refer to Step 1 above.

Risk classification is first established by the Business Relationship Manager based on predefined criteria for high-risk situations, then reviewed and assessed by the Compliance Officer, before being validated by the Compliance Committee. It should be noted that both the Legal & Compliance Department and the Compliance Committee retain the authority to classify a relationship as high-risk, even if it does not meet the specific criteria defined in our policy. In addition, risk assessments are reviewed during periodic or event-driven evaluations of the due diligence file.

In order to formalise and strengthen our risk assessment process, we have developed a dedicated due diligence assessment grid based on a standardised analytical model. This tool ensures the structured collection and systematic review of all relevant information required to assess the identified risk categories. The customer's final risk assessment is submitted to the Compliance Committee for validation, along with the applicable risk assessment grid, and is subsequently communicated in writing to the Business Relationship Manager upon approval.

The Legal & Compliance Department is composed of lawyers and legal professionals with the appropriate experience and expertise. This expertise is further strengthened through annual continuous training, enabling them to carry out well-substantiated assessments of the level of risk presented by each customer, based on the tools made available to them.

Enhanced Due Diligence

We conduct enhanced due diligence in alignment with the LPPM/LBMA Responsible Sourcing Guidances and the OECD Guidance for higher-risk categories. In 2025, approximately 27% of our upstream supply chain was classified as having high inherent risk. This classification primarily stems from the location of mining operations in high-risk jurisdictions or due to political exposure of an authorized signatory or ultimate beneficial owner (including roles such as board membership in a state-owned entity).

Additional relationships identified as high risk were attributed to the following factors:

- Sourcing from artisanal or small-scale mining operations,
- ESG-related concerns,
- Intermediate refineries that have not completed an OECD-equivalent audit or exhibit, material non-conformances,
- Risk classification escalated by the Legal & Compliance Department,

Types of High-Risk Supply Chain

Our 69 high-risk supply chain relationships are categorized as follows in 2025:

- Country risk: 44 cases,
- Country risk including PEP: 13 cases,
- PEP (Politically Exposed Person): 5 cases,
- ASM including PEP (Artisanal and Small-Scale Mining): 6 cases,
- ESG criteria: 0 cases,
- Other risk types: 0 cases,
- Intermediate refinery: 1 case.

Following the annual review, the Legal & Compliance Department prepares an overview which is presented to the Compliance Committee. The Compliance Committee then reassesses whether to continue these business relationships based on the updated risk analysis.

During the 2025 annual review, no decision was taken to terminate a relationship for compliance reasons.

Non-high-risk relationships are also reviewed each three to five years on a risk-based approach by the Legal & Compliance Department. In addition, every relationship is reviewed on an event trigger basis, such as a change of ownership, the identification of negative news, or changes in the supply chain.

Periodic Review Coverage

- **High-risk supply chain:** 100% reviewed during the year as part of the periodic review process.
- **Non-high-risk supply chain:** 22% reviewed during the year, representing the full scope of non-high-risk accounts scheduled for review in 2025.

In addition to the measures described above, other examples of enhanced due diligence measures undertaken in 2025 include:

1. additional questions and checks

For mining customers, these may include inquiries into site security measures, recruitment practices for security personnel, convoy safety protocols, and the role of counterparties in transportation; other areas of focus include descriptions of rehabilitation processes, the distance to the nearest village, the nature of relationships with local communities, and specific actions taken to mitigate environmental impact and reduce CO_2 emissions. For Clients located in conflict-affected areas, and/or for those whose shipments are expected to transit through such areas, Metalor must require detailed information on the type of transport to be used by the customer and, whenever possible, the planned route. For recycling customers, these typically involve requests for detailed information about melting processes and operational practices, along with a thorough evaluation of the customer's AML procedures and their implementation in day-to-day operations; this also includes analysing the KYC questions and documentation they request from their customers, comparing their responses to the company's AML policy, assessing whether the policy is appropriate for their business activities, and verifying the methodology used for maintaining records and registries.

In some cases, we may request supplementary documentation (such as copies of relevant agreements or courts decisions, personal criminal records, or supplementary identification documents) or arrange meetings with customers to facilitate clearer communication and address any concerns. Whenever necessary, the collected information is cross-checked against trusted external databases, including official registries, World-Check, or media platforms, to ensure thorough due diligence and mitigate potential risks.

Example:

For a specific customer, in order to ensure the highest level of transparency regarding the material to be refined, we requested the receipt of relevant records and video documentation of their melting operations corresponding to each bar received for refining.

2. Verifications via external databases (e.g. World Check) and through media searches

As part of the onboarding or periodic review process, we conduct a comprehensive screening of our high-risk counterparties, including their ultimate beneficial owners and all relevant entities and individuals (such as those involved in the shareholding structure, directors, signatories, and representatives) - to determine whether any are subject to sanctions, judicial proceedings or investigations, or are PEPs. We also conduct thorough media searches to assess the reputation of these customers. Depending on the findings, we may request further clarifications or additional details as outlined in the "In-depth analysis of the KYC" section.

Example: for several high-risk customers, we requested additional identification documents to verify and cross-check information flagged in World-Check - such as confirming the PEP status of associated stakeholders or confirming that the occurrences found were mismatches.

3. Continuous monitoring of our business relationships

A daily screening process is performed for our high-risk counterparties, including their ultimate beneficial owners and any entities or individuals involved in the shareholding structure. This process ensures that we are promptly notified of any sanctions, judicial proceedings, investigations, or other related legal matters, as well as updates on PEPs status. Alongside

this ongoing screening, we perform a daily media review to identify any adverse news or articles that may involve our counterparties.

Based on the severity of the notifications or news, we may initiate further information requests from our customers, including inquiries regarding the company's position on the matter, additional clarifications, or other details as outlined in the section "In-depth analysis of the KYC".

4. On-site visits of operational sites

A visit of our high-risk counterparties' premises and/or operational sites is conducted within six months of account opening, and subsequently every three years. We have at our disposal two distinct templates tailored to the business activities (mining and recycling customers). The individuals carrying out these visits have specialized expertise and extensive experience in the sourcing of precious metals. During these visits, particular emphasis is placed on assessing ESG factors as well as verifying the origin and traceability of the material.

During this period a total of 31 site visits were conducted, 12 classified as normal risk and 19 as high risk. 69% of these visits due in 2025 have been completed, with the remaining visits scheduled for 2026. The visit reports were prepared using an internal checklist based on the LPPM template, with a dedicated version for mining counterparties and another for all other clients. All visits were carried out by a Business Relationship Manager who has the necessary experience and expertise to conduct such audit visits, except for two conducted by a consulting firm specialized in ESG audits for the mining sector.

All visit reports conducted for our counterparties were prepared using an internal checklist based on the LPPM template, with a dedicated version for mining entities and another for non-mining clients. Both versions include a comprehensive assessment of ESG factors, ensuring consistent evaluation of environmental, social, and governance risks across all supply chains.

Each visit report is systematically reviewed and analyzed by the Legal and Compliance Department to ensure the consistency and accuracy of the information provided. When necessary, additional clarifications or documentation are requested from customers to substantiate the findings in the report.

It should be noted that we conduct on site visits both for high risk and normal risk Customers.

If, for compelling reasons, a site visit cannot be carried out, it will be postponed within a reasonable timeframe, in accordance with our internal guidelines. Additionally, if there is a specific safety risk due to the geopolitical situation, the option of engaging an external company specialized in ESG audits for the mining sector will be considered.

In conclusion, no zero-tolerance issues were identified.

5. intermediate refiners

Under the LPPM Responsible Sourcing Programme version 5, we confirm that no intermediate refiners have been identified within our supply chain. As a result, no site visits related to intermediate refiners or associated mining sources were required.

6. Autocatalytic Scrap Material

Metalor does not process autocatalytic scrap material. However, in line with LPPM expectations, our Executive Management has stressed within the organization the importance of preventing and combating metal theft across all supply chains. This approach complements our responsible sourcing framework and supports the integrity and traceability of our operations.

Monitoring and Continuous Control

In addition to the due diligence performed during the onboarding of counterparties, we ensure appropriate and continuous monitoring of transactions throughout the relationship, following a risk-based approach.

Transaction monitoring includes verifying the type, quantity, and expected purity of the materials received, as well as the consistency of the documents with each other and with the KYC information. Any unusual or high-risk transaction is reported according to our escalation process, and we ensure that the necessary clarifications are obtained.

All transactions are subject to operational checks. In cases of significant inconsistencies or suspicions, the material is placed in quarantine, and clarifications are initiated. Materials are only released once all inconsistencies have been resolved or when no doubt remains.

During the year, we identified one zero-tolerance non-compliance case within our supply chain. However, we did not encounter any incidents related to counterparty identification, the origin of precious metals, or traceability. The incident involved the receipt of a lot of silver bars from a Swiss collector without a recognized refinery trademark, which is non-compliant with Swiss precious metals legislation. A report was filed with the Swiss Precious Metal Control Office. The case is still ongoing.

We also did not detect any cases of child labor within our supply chain.

Step 3: Design and implement a management system to respond to identified risks

We have implemented a robust risk management system, already detailed under Step 2, to ensure the effective identification, assessment, and mitigation of risks within our supply chain. Cases identified as adverse are subject to a circumstantial and detailed analysis performed by the Compliance Officer.

Following this assessment, the case is escalated to the Compliance Committee, which is responsible for deciding on the appropriate course of action.

The Compliance Committee may decide to:

- Terminate the business relationship,
- Suspend the business relationship,
- Maintain the relationship with specific mitigating measures and enhanced due diligence actions to address and reduce the identified risks.

Risks leading to relationship termination:

In line with international standards, including LPPM and OECD due diligence guidance, the following risks result in immediate termination of the business relationship and formal reporting to the competent authorities:

- Money laundering,
- Terrorist financing,
- Serious human rights abuses,
- Direct or indirect support to illegitimate non-state armed groups,
- Fraudulent misrepresentation of the origin of minerals.

These cases trigger a zero-tolerance response and are escalated without delay to ensure compliance with legal, regulatory, and ethical requirements.

Risks leading to relationship suspension:

suspicion of:

- money laundering,
- terrorist financing,
- serious human rights abuses,
- direct or indirect support to illegitimate non-state armed groups,
- fraudulent misrepresentation of the origin of minerals,
- catastrophic ESG impacts.

These cases are escalated without delay to ensure compliance with legal, regulatory, and ethical requirements. These cases described above are thoroughly analyzed, and if the facts are confirmed, the business relationship is immediately terminated.

Continuation of relationship with improvement plan

In cases where certain non-conformities, weaknesses, or moderate risks are identified but do not represent a zero-tolerance breach, the business relationship may be continued under an Improvement Plan. This approach is applied when the assessment concludes that the counterparty is both willing and able to implement corrective actions within a reasonable timeframe and validate by the Compliance Committee.

The Improvement Plan outlines:

- Specific corrective actions required from the counterparty
- Clear deadlines for implementation
- Measurable targets and expected outcomes
- Supporting documentation to be provided
- Follow-up procedures, including enhanced monitoring or additional checks

Throughout the implementation period, as defined on a case-by-case basis, the Legal & Compliance Department closely monitors progress and may request periodic updates or additional evidence. Failure to complete the Improvement Plan adequately or within the agreed deadlines may lead to the suspension or termination of the business relationship.

No mitigation plan was initiated or continued in 2025.

Customer Disengagements in 2025

In 2025, we identified a total of 4 cases in which the Company decided to discontinue the business relationship. A summary of the reasons for disengagement is provided below:

- 3 cases due to missing or overdue compliance documentation during the due diligence renewal process (e.g., KYC information, UBO verification, refreshed DD documentation).
- 1 case was categorized as a compliance issue, which triggered an enhanced review by the Compliance function and resulted in the formal disengagement of the counterparty.

All disengagement decisions were made in accordance with internal policies, regulatory expectations, and the Company's risk-based approach to supply chain due diligence.

These cases were reviewed by the Compliance Officer and, escalated to the Compliance Committee for final decision.

In cases of business inactivity, our ERP system automatically blocks the customer account after 12 months without any activity, following the cessation of transactions. This automated control ensures that inactive accounts cannot be used without prior review and reactivation by the relevant internal function.

Reporting to Compliance Committee

In line with LPPM requirements, the Company has implemented a structured reporting mechanism to ensure oversight of high-risk supply chains, counterparties under risk-mitigation strategies, and the progress and effectiveness of improvement plans.

In addition to the reporting described in Step 1, bi-monthly updates on our risk-mitigation activities are presented to the Compliance Committee. These updates include:

- the identification and status of high-risk supply chains,
- counterparties subject to ongoing risk-mitigation strategies,
- the progress made on corrective actions and improvement plans,
- any significant developments requiring escalation,
- specific new customers onboarding,
- any relevant compliance topic

The Compliance Committee whose members are also members of the Board of Directors review these reports and take action whenever necessary, ensuring effective governance, timely decision-making, and appropriate oversight of compliance risks within the supply chain.

Step 4: Arrange for an independent third-party audit of the supply chain due diligence

Metalor has fully complied with Step 4: Arrange for an independent third-party audit of the supply chain due diligence.

Metalor is subject to an annual reasonable assurance audit as part of its responsible sourcing commitments. For the reporting period covering 1 January to 31 December 2025, Forvis Mazars SA was appointed by Metalor as the external audit firm to conduct audits across all Group refineries located in Switzerland, the United States, Hong Kong, Singapore and China.

The annual reasonable assurance audit is conducted by an external and accredited audit firm that is fully independent from Metalor, with no involvement in operational, commercial, or decision-making activities.

The audit teams carried out on-site reviews at these locations and applied the required audit procedures to assess the effectiveness and compliance of Metalor's supply chain due diligence framework, in line with the LPPM and the LBMA Responsible Sourcing Programme, the RJC CoP and CoC Guidance and the OECD Due Diligence Guidance, including its Gold Supplement.

No non-conformances were identified for the financial year ended 31 December 2025. Furthermore, no non-conformances have been identified since the implementation of the applicable guidances.

Step 5: Report on supply chain due diligence

Metalor has fully complied with Step 5: Report on supply chain due diligence

Our Responsible Precious Metals Group Policy is publicly available on the Metalor website. Our 2025 Compliance Report, together with the corresponding audit report, will also be published in 2026 on the Metalor website once issued.

In addition, we have:

- Responded to information requests from the LPPM, LBMA, RJC and other regulatory bodies, as well as to any allegations where applicable,
- Addressed, to the extent permitted by confidentiality and competitive considerations, enquiries from the media, NGOs and academic institutions regarding our sourcing activities, related business operations, compliance processes and counterparties,
- Complied with the reporting requirements of the DDTrO.

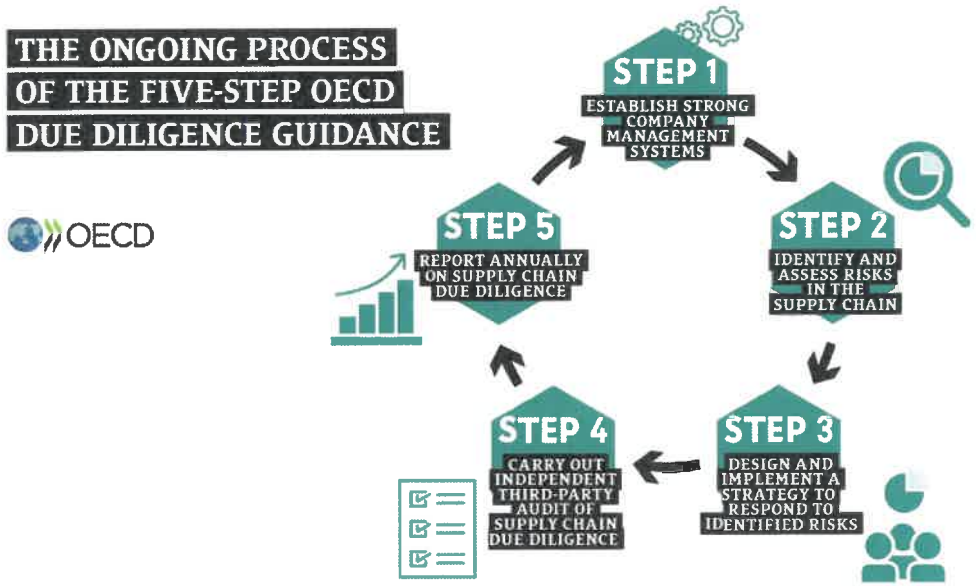


Table 3: Management conclusion

Is Metalor Technologies SA in compliance with the requirements of the Compliance with the LPPM Responsible Sourcing Programme version 5 (the "Programme") for the reporting period?

Yes

Metalor Technologies SA strives to continuously improve its own processes and practices as well as to play a leading role in the industry in further enhancing due diligence standards and practices. Metalor Technologies SA has implemented effective management systems, procedures, processes and practices to conform to the requirements of the LPPM Responsible Sourcing Programme version 5 and the OECD Guidance, including its Gold Supplement for all its precious metals supply chain for the reporting year ended 31 December 2025.

For Metalor, Corporate Social Responsibility (CSR) reflects our commitment to operating in a financially, socially, and environmentally sustainable manner. We firmly believe that our responsible business approach, combined with the dedication and expertise of our employees, is a key driver of our long-term success.

Metalor has committed to the Science Based Targets initiative (SBTi) in 2025, and over the next 18 months we will be working on further strengthening our climate-related methodologies and data. This work may progressively include more granular approaches to emissions measurement, climate target setting, and environmental performance management.

This year marks the fifth consecutive year that Metalor publishes its CSR Report, which is independently assured according to the ISAE 3000 standard. This external assurance reinforces the transparency, credibility, and robustness of our sustainability reporting. Our Corporate Social Responsibility (CSR) report is publicly available on the Metalor website: https://metalor.com/corporate-social-responsibility/csr-report/

Users of this report are welcome to provide feedback or address relevant queries to Metalor by Emailing: marco.pisino@metalor.com

Date of Report: 23.03.2026

Alexandre Fellay
Group General Counsel

Marco Pisino
Senior Group Quality & Sustainability Manager