

PRECIOUS METALS SUPPLY CHAIN POLICY

SEMPSA JP is based on principles aimed at establishing ethical relationships as a common guideline for the development of all its activities, thus avoiding the contribution to the development of armed conflicts, human rights abuses, organized crime, and/or money laundering.

As a result of the above, it is ensured that the origin of the precious metals is received is ethically acceptable.

With the internal and external promulgation of this document and the Precious Metal Origin Control Procedure, all conducted by the internal control bodies, the following is achieved:

- Show transparency in all our business processes, positioning ourselves against corruption, fraud, and money laundering.
- Establish the ethical, moral, and social guidelines to follow, in all our activities.
- Safeguard the ethical integrity of our business relationships with any entity or individual.

This policy, and the due diligence program and procedures that implement it, as well as our general regulations of business conduct, are based on the following standards:

- OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (CAHRA).
- Regulation (EU) 2017/821 of the European Parliament and of the Council, laying down supply chain due diligence obligations for Union importers of tin, tantalum and tungsten, their ores, and gold originating from conflict-affected and high-risk areas.
- London Bullion Market Association ("LBMA") Responsible Gold and Silver Guidance.
- Responsible Jewelry Council ("RJC").

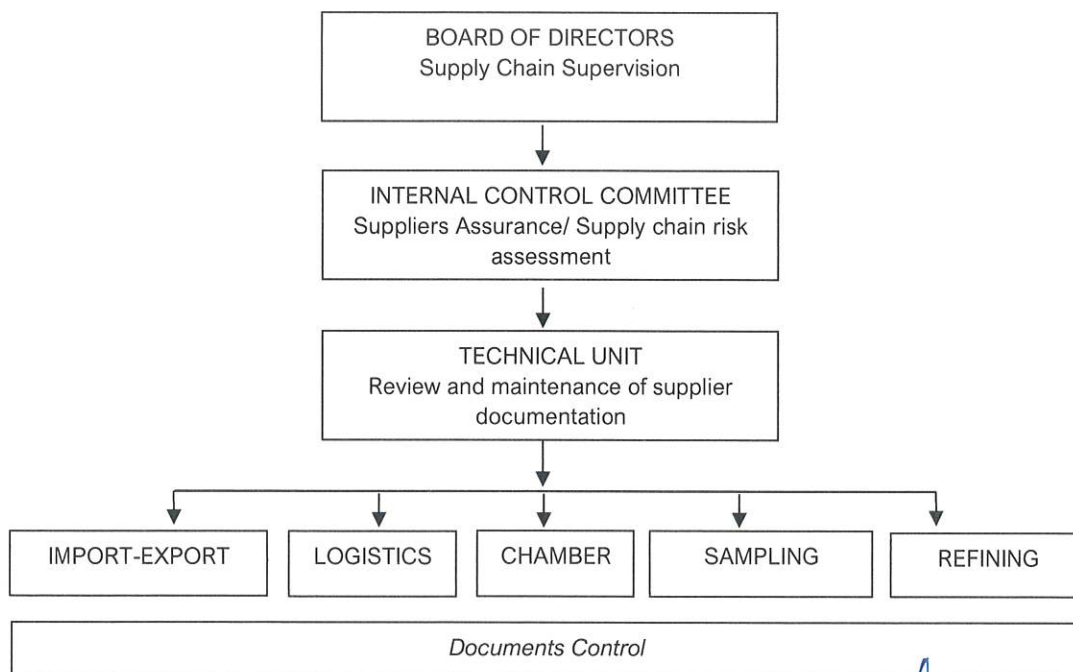
As a consequence, SEMPSA JP is committed to:

- Not contribute, facilitate, tolerate, or take part in:
 - Any form of torture, cruelty or degrading human treatment.
 - Any form of forced labor.
 - Any type of child labor.

- Human rights violations and abuses, such as widespread sexual violence.
 - War crimes, violations of international humanitarian law, crimes against humanity or genocide.
- There will be no relationship with suppliers linked to any of the serious abuses mentioned in the previous paragraph.
- Not to tolerate direct or indirect support to armed groups that do not belong to a State associated with the UN or associated with each other, by means of payments or providing assistance or equipment to firms or persons who illegally control mines, transportation routes, precious metals trading zones, or force the payment of taxes or extortion through import or export companies, agents or other intermediaries of any kind.
- In the same way, commercial relations will not be established with suppliers, who present a reasonable risk of having some type of relationship with what is described in the previous point.
- We affirm that the role played by public or private security forces in the mines or along the transportation route, should be the maintenance of the rule of law, guaranteeing human rights, with the aim of providing security to workers, facilities, properties and protect the mine from interference in the extraction, or transport routes of precious metals.
- We are committed to guaranteeing that the contracts signed by the companies in our supply chain with public or private security forces and bodies are carried out in accordance with the principles of security and human rights.
- When we identify the existence of a reasonable risk, we commit to immediately design, adopt, and implement a risk management plan with suppliers and other stakeholders to prevent or mitigate the risks of direct or indirect support to public security forces. or private.
- We will implement measures or support efforts to collaborate with central or local authorities and international and civil society organizations to:
- Contribute to finding feasible solutions on how to improve the transparency, proportionality and accountability of payments made to public security forces for the provision of security services.
 - Prevent or reduce the exposure of vulnerable groups (particularly artisanal or small-scale miners at certain points in the supply chain) to the negative effects associated with the presence of public or private security forces in the mines.

- We will not exercise inappropriate influences, offers, promises or coercion, in the same way that they will be rejected. It is not allowed to use company funds, obtain personal benefits through their use, or violate this policy in any way.
- The origin of the precious metal will not be supplanted, nor will taxes, royalties and payments to governments for its extraction, trade, handling, transport, or export be distorted. In this regard, we commit to ensuring that all taxes, fees, and royalties related to the extraction, trade, and export of minerals from conflict-affected and high-risk areas are paid to governments.

SEMPA JP will contribute to ensuring compliance with Regulation (EU) 2017/821 of the European Parliament and of the Council, laying down supply chain due diligence obligations for Union importers of tin, tantalum and tungsten, their ores, and gold originating from conflict-affected and high-risk areas, and the eradication of money laundering linked to the trade, transport, export, and extraction of precious metals, thanks to the following organizational structure:



Madrid, 18th of August 2023
Francisco Espinosa Muñoz
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