

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. .

Because of the above, it is ensured that the origin of the precious metals it receives is ethically acceptable.

With the internal and external promulgation of this document and the Precious Metal Origin Control procedure, all conducted by the Compliance Officer, the following is achieved:

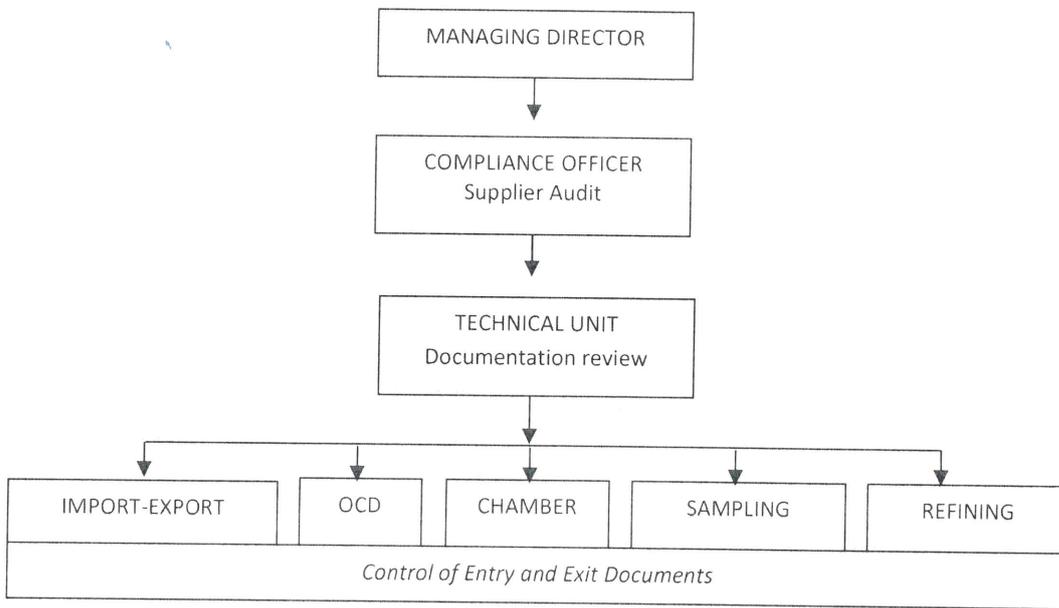
- Show transparency in all our business processes, positioning ourselves against corruption, fraud, and money laundering.
- Establish the ethical, moral, and social guidelines to follow, in all our activities
- Safeguard the ethical integrity of our business relationships with any entity or individual

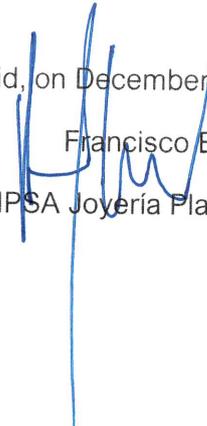
The scope of this policy is the supply chain of precious metals that reach the company and it is included within the Integrated Management System of SEMPSA JP, where the necessary actions are established to guarantee that the documentation and records of the supply chain Due Diligence y is available and updated, as well as scheduling the necessary training for SEMPSA JP's personnel, thus satisfying the control requirements in the supply chain, complemented by the Code of Conduct, the Corporate Social Responsibility Policy and the Integrated Management System Policy, with which the company commits to:

- Do not contribute, facilitate, tolerate, or take part in:
 - Any form of torture, cruelty or degrading human treatment
 - Any form of forced labor
 - Abuse or violation of human rights
 - War crimes, violation 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.
- No direct or indirect support of any kind to armed groups that control mines, transport routes, precious metals trading zones and actors upstream of the supply chain or compel the payment of taxes or extort money or minerals at mine access points, along transportation routes, or where minerals are traded, or illegally tax or extort import or export companies, agents, or other intermediaries of any kind.

- Likewise, no commercial relations will not be established with suppliers that present a reasonable risk of having some type of relationship with what is described in the previous point.
- We will also not tolerate direct or indirect support for public or private security forces that illegally control mines, transport routes and agents upstream of the supply chain, or illegally tax or extort access points to the mine, along the transport route, or to intermediaries, export companies or international companies.
- We affirm that the role played by public or private security forces in the mines or along the transportation route should be to maintain the rule of law, guaranteeing human rights, with the aim of providing security for 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 are carried out in accordance with the principles of security and human rights.
- We will implement measures or support efforts to collaborate with central or local authorities and international and civil society organizations to:
 - contribute to finding workable solutions on how to improve the transparency, proportionality and accountability of payments made to public security forces for the provision of security services.
 - avoid 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, taxes, royalties, and payments to governments for its extraction, trade, handling, transport, or export will be distorted.

It will contribute to the eradication of money laundering linked to the trade, transport, export, and extraction of precious metals, thanks to the following organizational structure:



In Madrid, on December 3, 2022

Francisco Espinosa
CEO of SEMPSA Joyería Platería SA