Global and Responsible Supply Chain Policy in Conflict-Affected or High-Risk Areas

1. Objective and Scope

Planta Recuperadora de Metales SpA (PRM SpA) is committed to maintaining a responsible global gold and silver supply chain, in accordance with Annex II of the OECD Due Diligence Guidance. PRM SpA recognizes that the risks of generating negative impacts may be related to the extraction, marketing, transport, and export of minerals from conflict and high-risk areas (CAHRA), and accepts the responsibility to respect human rights, not contribute to conflicts or financial irregularities, complying with standards on combatting the financing of terrorism (CFT) and integrate ESG factors throughout its supply chain. PRM SpA extends this policy to all employees, suppliers, and business partners involved in the mineral supply chain, incorporating it into contracts and/or agreements with raw material suppliers.

2. General Principles

Our commitment is to refrain from any action that contributes to the financing of conflicts, and we are committed to complying with the relevant United Nations sanctions resolutions, or failing that, with national laws that implement such resolutions. In this regard:

- PRM SpA will not tolerate, nor for any reason obtain benefits from, nor act to contribute to, assist or facilitate any form of human rights abuses, torture or cruel, inhuman or degrading treatment, forced labor, child labor, war crimes or other serious violations of international humanitarian law, as well as crimes against humanity or genocide.
- PRM SpA will not directly or indirectly support non-state armed groups. Direct or indirect support includes, but is not limited to, obtaining gold and/or silver ore, making payments, or providing logistical or equipment assistance to groups that illegally control mining sites or that otherwise control transportation routes, mineral trading points, illegally collect taxes, or extort money or minerals from intermediaries, exporting companies, or international traders.
- PRM SpA will eliminate direct or indirect support for public or private security forces that illegally control mining sites, transport routes, and upstream actors in the supply chain, and/or that illegally collect taxes or extort money or minerals. PRM SpA recognizes that the role of public or private security forces should be limited to maintaining the rule of law, protecting human rights, and providing security for workers, facilities, mining sites, and transport routes. Therefore, when PRM SpA or any other company involved in the gold and/or silver supply chain engages the services of public or private security forces, we commit to requiring that they interact in accordance with the Voluntary Principles on Security and Human Rights. Inspection policies will be adopted to ensure that individuals or security force units responsible for serious human rights violations are not engaged. Furthermore , support will be provided, or measures will be taken, to engage with local and central authorities, international organizations, and civil society organizations to help find viable solutions for improving transparency, proportionality, and accountability in payments made to public security forces. Likewise, measures will be taken to avoid exposing vulnerable groups, particularly artisanal and small-scale miners, to the adverse impacts associated with the presence of public or private

security forces at mining sites.

- PRM SpA will not offer, promise, grant, or demand any bribe, and will not comply with requests that seek to hide or falsify the origin of minerals, to fraudulently declare taxes, sums, and royalties paid to governments, in accordance with the purposes of extraction, trade, handling, transportation, and export of minerals.
- PRM SpA will contribute to the elimination of money laundering when a reasonable risk is identified related to the extraction, marketing, handling, transport or export of minerals.
- PRM SpA will ensure that all taxes, sums and royalties related to the extraction, trade and export of minerals from conflict and high-risk areas are paid to governments and in accordance with the company's position in the supply chain and undertakes to disclose information about such payments, according to the principles established by the Extractive Industries Transparency Initiative.

3. Risk Management

PRM SpA will apply due diligence measures to identify, prevent and mitigate risks, including:

- Serious human rights abuses: Immediate suspension with the provider in the event of a reasonable risk of serious abuses.
- Support for armed groups: The business relationship will be suspended in the event of reasonable risks.
- Public or private security forces: Upon identifying a reasonable risk, a management plan will be developed with the provider to prevent or mitigate those risks. If mitigation attempts fail within six months of the plan's adoption, the relationship will be terminated.
- Corruption, bribery, money laundering, and fraudulent disclosure: Interaction with affected parties (supplier, government, organizations, etc.) will be promoted, as appropriate, to prevent or mitigate the risks of impacts, using quantifiable measures taken within a reasonable timeframe. Interaction with the supplier will be suspended after unsuccessful mitigation attempts.

4. Risk Classification

a. Minor or mitigable: work with the supplier on an improvement plan with defined deadlines and strict monitoring.
b. Serious and unmitigable risk: temporary suspension of the business relationship until the cause of the risk is resolved.
c. Critical risk: terminate business relationship immediately, informing the relevant authorities if applicable.

5. ESG Commitments and Risk Management

PRM SpA reinforces its commitment to environmental, social and governance principles, committing to the continuous assessment of risks for all actors in its gold and silver supply chain.

Environmental : Minimize negative impacts, promote the sustainable management of natural resources, and protect biodiversity, water, and soil. Avoid practices that cause illegal deforestation, pollution, or irreversible loss of ecosystems. Support responsible mining practices. Comply with applicable environmental regulations and implement environmental management systems.

Social : Guarantee safe, dignified, and fair working conditions. Promote community development. Respect human, labor, and trade union rights. Provide effective complaint and remediation mechanisms.

Governance: Working ethically and transparently. Complying with local and international regulations , establishing internal controls and independent audits. Ensuring traceability and transparency in the supply chain.

PRM SpA will identify ESG risks in its supply chain, classifying them according to their severity and probability, thus defining a management strategy, which it will apply, as appropriate: i) suspending refining when it is concluded that catastrophic ESG impacts have been reported, ii) continuing the refining of silver and gold, when there are minor material violations of environmental, health, safety, labor and local legislation, related to the community, and/or ESG risks that have a high probability of resulting in highly adverse impacts, with the consequent mitigation plan to be applied.

6. Implementation and Supervision

PRM SpA expresses its commitment to due diligence through:

- The designation of the COO as Due Diligence Manager, being responsible for the Management System.
- The performance of an annual audit conducted by third parties.
- Generation of an annual public due diligence report.
- Supervision and training of relevant personnel on due diligence matters.
- Demand traceability from Codelco, the sole supplier of copper anode slime (with gold and silver).
- When dealing with a new supplier, KYC assessment and risk analysis will be applied, in accordance with the OECD Guide.
- Maintaining a secure and accessible complaints channel for workers and the community through the PRM website: https://prm.cl/reclamos-quejas/

Ho Cheol Shin
CEO, PRM

Policy established in August 2017. Modified in June 2019 according to the OECD's Due Diligence Guidance for Responsible Mineral Supply Chains. In April 2021, the scope was modified to include gold and silver. The RMI claims mechanism was eliminated in February 2025. ESG issues were considered starting in August 2025. **https://prm.cl/#POLITICAS**