

ANNUAL REPORT ON DUE DILIGENCE OBLIGATIONS YEAR 2025

Step 1: Internal Management System

ECOMETAL SA operates in the sector of processing production waste containing precious metals and, in accordance with its Corporate Policy, declares its commitment to managing and developing its activities with constant attention to and continuous improvement of the quality of its products/services, as well as the protection of employees, the environment, and the community.

ECOMETAL SA has implemented a corporate management system described in specific manuals and procedural codes that outline its approach to anti-money laundering, counter-terrorism financing, and ethics through the development of a specific Code of Ethics and procedures for responsible sourcing, based on the principles of the RJC Code of Practices (2024 edition) and in accordance with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas.

The definition of corporate roles and responsibilities is well structured and shared with all relevant stakeholders as required by the internal management system. Responsible functions are periodically informed about changes in the applicable legislation and regulations.

In practice, the management system requires the use of defined documentary support. Counterparties are periodically informed of the need to align with the principles adopted by the company through the dissemination of its General Policy and the consequent request for acknowledgment and acceptance of its contents.

Upon engagement with counterparties, confirmation of their eligibility is carried out.

Step 2: Identification and Assessment of Risks in the Supply Chain

The identification of supply chain-related risks is conducted according to the risk indicators referenced in the supplement to the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas.

In order to further investigate and assess risks associated with counterparties' activities, ECOMETAL SA has decided to fully outsource the compliance activities to an external organization of professionals.

Following the evaluation of the information and documentation provided, the organization determines the qualification status of the counterparty for the activation of transactions.

The sharing of principles is carried out through the transmission of the Corporate Policy and its related annexes, and counterparties are required to endorse the principles contained therein.

At the conclusion of the assessment process, the appointed responsible function informs Management of the outcome.

ANNUAL REPORT ON DUE DILIGENCE OBLIGATIONS – YEAR 2025

Step 3: Implementation of a Risk Management System

In case of news, or information, or critical assessment results relating to a counterparty, there are reasonable suspicions of involvement in illicit activities, internal management procedures are activated as provided for by the applicable Swiss sector regulations.

During the period January–December 2025, no counterparties or transactions classified as high risk were identified. All personnel involved in the management of materials to be processed are aware of the importance of reporting any suspicious or questionable transactions to Management.

Step 4: Third-Party Audit on Due Diligence

ECOMETAL SA is certified under the RJC COP, consequently its Due Diligence process is verified at established intervals. The renewal of the certification is scheduled by the end of July 2026, with the consequent confirmation of the supply chain Due Diligence process.

Step 5: Report on Supply Chain Due Diligence

This report is the first to be structured and organized in this format. It will be supplemented during future revisions with any additional data and comments deemed relevant.

During the observation period, no high-risk transactions within the Supply Chain were identified according to the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from CAHRA, nor were any transactions conducted with mines or with unverified or unqualified counterparties.

The Management

