

ECOMETAL SA operates in the field of precious metal refining and the treatment of processing waste containing noble metals.

In line with the directives of the General Management, it declares its commitment to managing and developing its supply chain according to the requirements established by the Responsible Jewellery Council and in accordance with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas.

Therefore:

Regarding serious abuses associated with the extraction, transport, or trade of minerals:

We will not tolerate, nor in any way profit from, contribute to, assist in, or facilitate the commission by any party of:

- any form of torture, cruel, inhuman, and degrading treatment;
- any form of forced or compulsory labour, meaning work or service exacted from any person under the threat of penalty and for which the person has not volunteered;
- the worst forms of child labour;
- other serious human rights violations and abuses such as sexual violence;
- war crimes or other serious violations of international humanitarian law, crimes against humanity, or genocide.

Regarding the management of risks of serious abuses:

We will immediately suspend or terminate engagement with upstream suppliers if we identify a reasonable risk that they source from, or are linked to, a party committing serious abuses.

Regarding direct or indirect support to non-state armed groups:

We will not tolerate any direct or indirect support to non-state armed groups through the extraction, transport, trade, handling, or export of minerals.

Direct or indirect support to non-state armed groups through the extraction, transport, trade, handling, or export of minerals includes, but is not limited to, sourcing minerals, making payments, or providing logistical assistance or equipment to non-state armed groups or their affiliates who:

- illegally control mining sites or otherwise control transportation routes;
- illegally control mining sites, transportation routes, mineral trading points, or upstream actors in the supply chain;
- illegally tax or extort money or minerals at points of access to mining sites, along transport routes, or where minerals are traded;
- illegally tax or extort money or minerals from intermediaries, export companies, or international traders.

Regarding the management of risks of support to non-state armed groups:

We will immediately suspend or terminate engagement with upstream suppliers if we identify a reasonable risk that they source from, or are linked to, a party providing direct or indirect support to non-state armed groups.

Regarding public or private security forces:

We agree to eliminate direct or indirect support to public or private security forces that:

- illegally control mining sites, transport routes, and upstream actors in the supply chain;
- illegally tax or extort money or minerals at access points to mining sites, along transport routes, or at points where minerals are traded;
- illegally tax or extort intermediaries, export companies, or international traders.

We recognize that the role of public or private security forces at mining sites and/or surrounding areas and/or along transport routes must be exclusively to maintain the rule of law, including safeguarding human rights, ensuring the safety of workers, equipment, and mining facilities, and protecting mining sites or transport routes from interference with legitimate extraction and trade.

When we or any company in our supply chain contract public or private security forces, we commit to or require that such forces are engaged in accordance with the Voluntary Principles on Security and Human Rights. In particular, we will support or adopt screening measures to ensure that individuals or units of security forces responsible for serious human rights abuses are not hired. We will support efforts or implements measures to engage with central and local authorities, international organizations, and civil society organizations to help develop workable solutions regarding transparency, proportionality, and accountability in payments made to public security forces for security provision. We will support efforts or take steps to engage with relevant stakeholders to avoid or minimize exposure of vulnerable groups, particularly artisanal miners, to negative impacts associated with the presence of public or private security forces at mining sites.

Regarding risk management of public or private security forces:

In accordance with the company's position in the supply chain, we will immediately develop, adopt, and implement a risk management plan with upstream suppliers and other stakeholders to prevent or mitigate the risk of direct or indirect support to public or private security forces, as identified, where such risk exists. In such cases, we will suspend or terminate engagement with upstream suppliers after unsuccessful mitigation attempts within six months of adopting the risk management plan.

Regarding corruption and fraudulent misrepresentation of mineral origin:

We will not offer, promise, give, or demand bribes and we will oppose the solicitation of bribes to conceal or disguise the origin of minerals or to misstate taxes, duties, and royalties paid to governments for the purposes of extraction, trade, handling, transport, and export of minerals.

Regarding money laundering:

We will support efforts or take measures to contribute to the effective elimination of money laundering where we identify a reasonable risk of money laundering arising from, or linked to, the extraction, trade, handling, transport, or export of minerals resulting from illegal taxation or extortion of minerals at access points to mining sites, along transport routes, or at trading points by upstream suppliers.

Regarding payment of taxes, fees, and royalties due to governments:

We will ensure that all taxes, duties, and royalties related to mineral extraction, trade, and export from conflict-affected and high-risk areas are paid in accordance with the company's position in the supply chain. We commit to disclosing such payments in accordance with the principles established by the Extractive Industries Transparency Initiative (EITI).

Regarding risk management of corruption, fraudulent misrepresentation of mineral origin, money laundering, and payment of taxes, fees, and royalties:

Based on the company's position in the supply chain, we commit to engaging with suppliers, central or local government authorities, international organizations, civil society, and governments, as appropriate, to improve and monitor performance in order to prevent or mitigate risks of negative impacts through measurable actions within reasonable timeframes. We will suspend or terminate engagement with upstream suppliers after failed mitigation attempts.

The Management