METALOR® TANAKA A member of TANAKA

MODERN SLAVERY REPORT FOR THE YEAR 2022

The UK Modern Slavery Act 2015 (the 'Act') requires business to state the actions they have taken during the financial year to ensure modern slavery is not taking place in their operations and supply chains. We are fully committed to playing our part in eradicating modern slavery. We firmly advocate for transparency and collaboration to eliminate the risks of modern slavery. This statement refers to the financial year ending 31 December 2022. It sets out the steps taken by Metalor to prevent modern slavery in its own operations and supply chains.

DUE DILIGENCE PROCESSES

Within our 3 divisions and our corporate functions, the company is well advanced in respect of supplier due diligence. In terms of risk, and due to nature of Metalor business with an intensive use of precious metals, the Refining division is the most exposed to potential slavery concerns. Sourcing of metals, particularly mining material, is originated from developing countries where the respect of the legal system has still a significant room for improvement. This includes as well the additional risk of corruption and non-respect of human rights, including child labour. Compliance process are fully deployed in that division. Regarding advanced coatings, and even though the potential risk of the activity from that perspective is substantially lower, a due diligence and compliance system has been also implemented. We believe that this is a proportionate and fit-for-purpose supplier process.

The due diligence fully responds and it is in compliance with the standards of the London Bullion Market Association (LBMA) and Responsible Jewelry Council (RJC) that include, but are not limited to, the respect of human rights along the supply chain. Metalor has successfully passed LBMA and RJC audits (run externally by

independent audits firms) for all its refining locations for the year 2022. It is worth noting that the due diligence process of Metalor has incorporated in 2022 all new requirements mandated by Version 9 of Responsible Gold Guidance of the LBMA, which introduces even more stringent rules in terms of compliance.

Additionally, Metalor is a member of the UN Global Compact www.unglobalcompact.org and as such it embraces its ten principles which means operating in ways that, at a minimum, meet fundamental responsibilities in the areas of human rights, labour, environment and anti-corruption.

Metalor abides as well with the rules set forth by the so called **"Uyghur Forced Labor Prevention Act"** enacted by the USA in December 2021. This Act ensures that goods made with forced labor in the Xinjiang Uyghur Autonomous Region of the People's Republic of China do not enter the United States market. Metalor does not take any material or services coming from that Chinese region.

WHISTLEBLOWING POLICY

Metalor has implemented a "Whistleblowing Policy" that includes a direct and confidential line of communication with the General Counsel of the company, available to employees and third parties to raise concerns regarding unsafe, unethical or unlawful conduct. This is one of the ways employees, suppliers and contractors can notify Metalor if they have concerns regarding any slavery or human trafficking in our business or supply chains. The General Counsel has full autonomy to launch investigations and take appropriate actions within the company to prevent this kind of conducts.

SUPPLIER TERMS & CONDITIONS

Current suppliers considered to be exposed to the greatest risk, dependent on industry, sector and country, are currently having their terms and conditions enhanced to include a modern slavery provision on a case by case basis. A modern slavery clause has been added to all Purchase Orders that the company is issuing to all its suppliers stating that compliance with the UK Slavery Act is a "must" for all Metalor suppliers in the UK. In addition, a new annex called "11.108 Annex of Metalor Technologies (UK) Ltd Code of Conduct for all Business Partners" has been implemented whereby the supplier has to confirm that. Accordingly, we request that representatives of the undersigned company will ensure that :

1) no form of forced, bonded or involuntary labor and human trafficking is used by it or in its supply chain,

2) child labor is strictly prohibited in its organization and/or in its supply chain.

Moreover, the supplier commits to make every appropriate and reasonable effort to implement and to apply the principles and values described in such annex.

TRAINING AND AWARENESS

Members of Metalor Legal & Compliance teams have provided workshops and training to the members of the marketing, sales, front office, logistics and treasury teams across the company to provide a yearly update on compliance processes and trends, making special emphasis on human rights, including modern slavery. This is becoming part of the regular annual training organized every year. The intent is to raise awareness of the issue of modern slavery amongst our employees.

OUR COMMITMENT

Metalor is committed to ensuring that there is no modern slavery in our business or any of our supply chains. Our ambition is to demonstrate that this is the case by undertaking the steps outlined in this statement, working with our supply chain partners and by building increasing rigor in our supply chain due diligence processes.

This Statement is made pursuant to Section 54 of the Modern Slavery Act 2015.