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July, 2024

1- Company Information:

Company Name: Marsam Refinadora de Metais Ltda.

The Responsible Sourcing Initiative CID number is CID002606.

Head offices are located at: Rua Antonio das Chagas, 1733, São Paulo, SP Brazil.

Company has a branch located at Alameda Juari, 310, Barueri, SP Brazil.

The company was established in 1997 under the name of UBR (Brazilian Union Refiners) as a merger of three other refiners: (i) Vanity Metals founded in 1982, (ii) Goldmine Refiner founded in 1984 and (iii) Ourinvest Refiner founded in 1981.

The company engages in refining gold and other precious metals for third parties. It does not purchase gold or any other precious metals and does not take title of the refined materials. The company processes dore gold, fine gold bars, and scrap jewelry.

The company's portfolio of clients includes mining companies, financial Institutions, precious metals brokers, jeweler manufacturers, jeweler retailers, import and export companies, scrap gold buyers, investors, among others.

This report covers calendar year 2024.

2- Responsible Minerals Assurance Process (RMA) Assessment Summary

Marsam refinery has been audited for the first time, under CSFI protocol for the period of 01/01/2016 through 31/03/2017. The assessment was conducted by Intertek do Brazil on March 27, 2017. The final report was issued on March 31st, 2017.

Subsequently the company has been audited under the new RMI protocol for the period of 04/01/2017 through 31/05/2018. The assessment was conducted by UL Responsible

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Sourcing (formerly STR Responsible Sourcing) on June 14 and 15, 2018. The final report was issued on September 7, 2018.

Following 2018 audit, on 2019 an off-Year RMAP Conformance remote audit process conducted on July 2019, and final “conformance status” granted by email on July 23, 2019, by Ms. Catherine Tyson, RMI program manager.

Another onsite RMAP audit took place on October 2021, for the period from 06/01/2018 to 07/31/2021, conducted by Arche Advisors from 10/13/2021 to 10/20/2021. The final report was issued on 05/10/2022 and a Corrective Action Plan (CAP) was conducted by Marsam to address each of the auditor’s findings, however on 11/28/2022 RMI considered that there were many remaining non-conformant issues after CAP conclusion and changed Marsam RMAP status to “NON-CONFORMANT” on the “RMAP Conformance Sites” list.

In accordance with RMI program rules, another audit process could only be solicited by Marsam after 180 days of status change, however, until present date, Marsam’s Board of Directors decides to not reapply for new audit procedures.

The RMAP assessment reports are available at:

<http://www.responsiblemineralsinitiative.org> and

<http://www.marsamrefinadora.com.br>

3- Company Supply Chain Policy

The company has implemented a Supply Chain Policy since 2013, with specific focus on avoiding processing of any precious metals that potentially could be classified as conflicted material. Supply Chain Marsam’s Policy had been updated on July 2021, July 2022 and last update on November 2023 valid for the next three years, policy is in line with OECD Annex II requirements.

Supply Chain Marsam’s Policy is clearly communicated to stakeholders and its employees, covering not only gold, but all other precious metals, and is available at www.marsamrefinadora.com.br.

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The Policy last review in November 2023 is aligned with Board commitment for continuous improvement on adherence to Marsam's operational procedures and focus to fast address anyidentified red-flags or risks due to regulatory environment changes.

4- Company Management System

a- Management Structure

The company has an Internal Procedures Manual ("MCI"), for implementing Know Your Client (KYC), Know Your Employee (KYE), Know your Supplier (KYS), Anti-Money Laundering (AML), Counter-Terrorism Financing (CTF), Anti-Bribery policies, Code of Ethics and Supply Chain Policy and procedures (ID CAHRAs, RED FLAGS, RISK MITIGATION, etc.).

The following Managerial responsibilities are defined in the Manual:

- Board of Directors: responsible for overseeing the implementation of the policies, and specifically responsible for Risk Mitigation Strategy and action plans execution.
- Plant Manager: responsible for implementation and reviewing the day-to-day due diligence process.
- Internal Compliance Committee (CIC): responsible for the day-to-day due diligence process, red flags enhanced due diligence process, risk classification, compliance analysis and reports, policies, and procedures review.
- Commercial Department is responsible for developing the KYC processes and evaluating clients' Supply Chain policies and programs and conducting onsite risk assessments.

Training sessions are conducted annually for all staff members; last training sessions took place in December 2024.

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The company has redefined its internal compliance process to be aligned with the RMI's Responsible Minerals Assurance Process (RMAP), Gold Refiner Standard, in February of 2018 and reviewed process and procedures in December 2019, July 2021, July 2022, and November 2023.

Independent External Audit is in place for yearly reviews of internal procedures and policies adherence, last report available based on 2024 fiscal year.

b- Internal Controlling Systems

The company reviews the KYC related documentation of its clients once every 24 months, to update client's KYC status.

Regular Compliance Committee meetings are held to review all active client's volumes, KYC, AML, CTF and Client's Origin Declarations to check if all client's precious metals processes during the analysis period are aligned with company and international standards.

Documents for each Compliance Committee meeting have been maintained on company records for at least five years. Any atypical or suspicious activity should be mandatory communicate to Brazilian Financial Intelligence Unit (COAF/MF) and to the Executive Board.

In July 2022, new internal procedures were defined for Red Flags and Risk Identification, Onsite Risk Assessment and Risk Mitigation aligned with OECD due diligence guidance and other potential risks defined as relevant by Marsam for its supply chain. Procedure was updated in November 2023 and in November 2024. Enhanced due diligence procedure is mandatory for all red flags and supply chain risks identified.

Onsite risk assessment methodology and sampling criteria for visits are under Internal Compliance Committee responsibilities.

For the clients who had red flags and potential risks identified, KYC should be review every 12(twelve) months and an onsite risk assessment could apply, which sampling criteria are under Internal Compliance Committee responsibilities, and may include

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client internal control procedures verification, existence of Compliance department and its KYC, AML, CFT, Anti-Bribery and Supply Chain policies, suspicious of human rights violations, slave labor, child labor, presence of armed conflict or private or public security forces, any forms of extortion, within other crimes, on the extraction sites, transport routes and trading facilities of precious metals, resulting in a onsite risk assessment signed report, addressing client's suitability, red flags, identified risks of the client's materials and relevant public and grievance information.

Such report is used as a basis to establish client risk classification by Internal Compliance Committee, resting on Marsam's Executive Board the execution of Risk Mitigation Strategy and action plans, which may include suspension or termination of client's commercial relationship.

Throughout 2024, several enhanced due diligence procedures were conducted on clients with red flags or potential risks identified by Internal Compliance Committee, including assessment on client's KYC, AML, CTF, Anti-Bribery and Supply-Chain procedures and verifying other OECD Annex II requirements.

The following clients were submitted to on-site enhanced due diligence procedures in 2024:

- Havila Joalheria Lyda. – Tax ID Number 37.800.001/0001-20;
- ORIT Artigos de Luxo Ltda. – Tax ID Number 02.071.667/0001-00;
- Ouro Oliveira Compra e Venda de Joias Ltda. – Tax ID Number 40.128.055/0001-04;

The following clients were submitted to remote enhanced due diligence procedures in 2024:

- Le Gold Comercio de Metais Ltda. – Tax ID Number 46.888.831/0001-00;

For each enhanced due diligence procedures conducted a report was issued, in accordance with the standard model defined on Marsam's Internal Controls Manuals. Client risk classification review by Internal Compliance Committee and Marsam Board's decision on mitigation procedures implementation and business relationship continuation were supported by such reports.

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For all incoming precious metals of non-certified refiners, it is required that the client provide a certified signed statement of the origin of the material, where clients are required to confirm that the all-incoming material complies with OECD policies and does not come from conflicted-affected or high-risk areas (CAHRAs). For clients sourcing from LSM and ASM, each mining license number should be informed in the statement of the origin of the material.

For all incoming precious metals classified as High-Risk, segregated processing is required, and individualized identification as High-Risk is applicable.

Risk mitigation strategy includes EDD for red-flags and risk identified clients, risk classification by CIC, 180 days risk mitigation action plan, action plan performance and effectiveness measurements, determination on continuing or terminating the business relationship, full process record keeping and disclosure at Public Due Diligence Report and to Auditors.

c- Record Keeping

All client's and company invoices are electronically registered in its accounting system and records are kept for at least five years.

All files and Compliance Committee reports are maintained for at least five years.

In addition to the RMI's RMAP process, Marsam does an annual evaluation review of its systems and processes, aiming at its improvement. The company also maintains an external auditor for its financial and accounting systems.

These Auditors also perform a physical mass balance annually and accompany the annual inventory. At this inventory, a physical counting of the materials is performed and compared with internal accounting records and operational controls.

5- Risk Identification

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Marsam only processes material that comes from Brazil. For all incoming shipments of non-certified refiners, it is required that clients provide a certified signed statement of the shipped material (Precious Metals Origin Declaration).

Regular Compliance Committee meetings are held to identify any inconsistencies, red flags, or potential risks.

At least every 24 months, all active clients' KYC are updated, or in shorter periods for medium-risk or high-risk classification clients.

Prior to acceptance of any new client, Marsam conducts a KYC and DD evaluation process, verifying clients' legal status, final beneficiary owners, source of funds, existence, and commitment to a Supply Chain Policy compatible with OECD's requirements, existence, and commitment to an AML, CTF and Anti-Bribery Policies compatible with Brazilian Laws, an assessment about the kind and the amounts of materials to be sent to Marsam (primary mine material, artisanal miners' material, scrap material and/or fine gold) and a media research to identify potential or allegations of reputational or criminal issues.

For red flags or potential risk clients, enhanced due diligence is mandatory, which parameters, methodology and sampling definitions are under Internal Compliance Committee responsibilities, who also is responsible for final client risk classification.

Any inconsistencies, red flag, potential risks, grievances, or media claims identified on clients file review or on the day-to-day relationship are communicated to clients for clarification and or mitigation, if needed.

Eventually, if high-risk clients are identified, Marsam's Executive Board should decide on client's relationship suspension or termination, and on risk mitigation plan implementation.

All identified risks are communicated to the internal Compliance Committee.

No red-flags as defined by the OECD Annex II and Gold supplement have been identified so far, but others supply chain potential risks were identified, related to ASM sourcing, and are under Internal Compliance Committee review for appropriate measures.

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In 2024, a single event was identified involving Client insufficient internal controls and non-compliance with the requirements set forth in the Brazilian legislation on Anti-Money Laundering and Counter-Terrorism Financing (AML/CTF), as well as other regulations issued by COAF/MF. The situation was addressed by Marsam's Internal Compliance Committee through the suspension of the client's operations and a formal recommendation for the necessary adjustments to comply with current legislation. This measure remained in effect until the receipt of documents that unequivocally demonstrated the Client's adherence to applicable Brazilian laws and regulations. An additional period of 180 (one hundred and eighty) days was established for a new assessment of the client's operational procedures in adherence to its updated manuals and internal policies.

6- Public Reporting

The annual report that conforms to RMAP Gold Standard and OECD due diligence requirements are available on company's website (www.marsamrefinadora.com.br) along with a summary copy of the RMAP audit assessment report and updated company's Supply Chain Policy.