RMI_RMAP Responsible Minerals Sourcing Due Diligence Report on Gold

Mitsui Kinzoku Co., Ltd.　Takehara Refinery

1. Corporate Profile

Takehara Refinery (CID No. CID001193) (hereinafter referred to as “Takehara”), Mitsui Kinzoku Co., Ltd., consists mainly of four plants, including a metal plant that produces high-purity gold, and began its operations in 1937.
In addition to gold, the metal plant manufactures products from 10 elements, including silver, copper, and lead, etc.

2. RMI_RMAP (Responsible Mineral Assurance Program) Assessment Summary

In 2025, Takehara underwent a recertification audit by Intertek Certification Japan Ltd. to determine whether it complies with the RMAP for gold and was recognized as Conformant in January 2026.
https://www.responsiblemineralsinitiative.org/media/docs/Public%20Reports/Mitsui%20Mining%20Public%20Report.pdf

The next third-party assessment is scheduled to be conducted in May 2026.

May 19 - 20, 2025 Takehara Refinery, Mitsui Kinzoku Co., Ltd.

This assessment is valid for one year. The assessment period is from April 1, 2024 to March 31, 2025.

3. Company Supply Chain Policy

Mitsui Kinzoku Group promotes responsible minerals sourcing. As a company in the minerals supply chain, we are aware of the possibility that risks in the supply chain related to minerals sourcing could affect our Group’s business. With growing international interest in responsible minerals sourcing, the scope of target risks is expanding, target areas are widening to Conflict-Affected High-Risk Areas (CAHRAs), and other minerals are being included as target minerals. Mitsui Kinzoku Group has established an inclusive policy for responsible minerals sourcing.

With regard to minerals sourcing, Mitsui Kinzoku Group fulfills its corporate social responsibility in its mineral supply chain in compliance with applicable laws and regulations and in accordance with standards and guidance from international initiatives such as RMI, LBMA and LME.

Mitsui Kinzoku Group has a policy of not using as raw materials any minerals that originate from Conflict Affected High-Risk Areas (CAHRAs) and that are involved in any of the illegal activities described in Annex II, paragraphs 1 to 14 of the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas. We also promote initiatives related to human rights and labor, health and safety, the environment, and ethics, and address sustainability in the mineral supply chain.

4. Company Management System

4-1 Management structure

The Company has established a group-wide supply chain management system to manage risks and to implement its procurement policy in the supply chain. We have appointed a senior executive officer in charge of our procurement as Chief Supply Chain Officer and have organized a Supply Chain Committee that brings together representatives from each department.
The committee reports to the Board of Directors once a year in principle on supply chain management activities, including responsible minerals sourcing, and the status of risk management.

4-2 Internal management system

The Company notifies its suppliers of its policy and procurement requirements through the KYC system for each of the following items.

(1) Responding to systematic or widespread human rights abuses associated with the extraction, transportation, and trade of gold and silver raw materials.
- All forms of torture or inhuman or degrading treatment.
- All forms of forced labor.
- The most serious forms of child labor.
- Other significant human rights violations and abuses, including widespread sexual violence.
- War crimes or other serious violations of international humanitarian law, crimes against humanity, or genocide.

(2) Responding to direct or indirect support for non-governmental groups.
- Illegally controlling mines or controlling upstream parties on transportation routes, at mineral trading hubs, and in supply chains.
- Illegal taxation and extortion of money and minerals at access points to mines, along transportation routes, and at mineral trading hubs.
- Illegal taxation or extortion of intermediaries, exporters, or international traders.

(3) Responding to bribery and misrepresentation of country of origin.

(4) Responding to defaults on taxes, fees, and mining charges payable to governments in connection with the extraction, trade, and export of minerals from Conflict Affected High-Risk Areas (CAHRAs).

(5) Responding to the prevention of money laundering and the provision of funds to terrorists.

(6) Responding to complicity in conflicts.

(7) Comply with the regulations and company policies of the countries where we do business regarding the environment, health, safety, and labor.
- Air, water, and soil pollution and incident management plans.
- Water stewardship, especially in areas with scarce or insufficient water resources.
- Illegal procurement from World Heritage sites and protected areas.

(8) Storage, handling, and disposal of hazardous chemicals such as mercury and cyanide.

(9) Managing labor issues, including compensation and working hours, collective bargaining, discrimination, diversity, labor disputes, and worker safety.

(10) Community collaboration and coexistence plans (land acquisition and resettlement of local communities, cultural sites and indigenous peoples, mine closure plans and protection of affected people).

(11) We incorporate risk management related to items stipulated in OECD Guidance ANNEX II on achieving business integrity and ethical behavior, and supporting the implementation of related initiatives such as the Extractive Industries Transparency Initiative (EITI), and we promote initiatives related to human rights, labor, health & safety, the environment, and ethics in accordance with the Mitsui Kinzoku Group policy.

4-3 Record keeping system

The manual prescribed by the Company stipulates that records related to responsible minerals sourcing shall be retained for at least 10 years.

4-4 Risk assessment

The Group identifies its CAHRAs for gold four times a year. Identifying CAHRAs is based on the following categories of information, and we assess CAHRAs against internally established criteria values:

(1) The Democratic Republic of the Congo (DRC) and nine adjoining countries specified in Article 1502 of the U.S. Dodd Frank Act;
(2) Countries/regions listed on the CAHRAs list (EU-CAHRAs List) under REGULATION (EU) 2017/821, published by the European Commission;
(3) Countries and regions at Intensity 4 or higher on the Heidelberg Conflict Barometer;
(4) Latest ranking of the Fragile States Index;
(5) Countries and regions subject to enhanced monitoring and calls for action by the Financial Action Task Force on Money Laundering;
(6) Worldwide Governance Indicators;

Other information such as statements from the United Nations High Commissioner for Refugees and the SDN list were also used to identify CAHRAs. We confirmed that there were no problems with country of origin, traceability, etc., in the relevant fiscal year of assessment.
Furthermore, starting next fiscal year, the Human Rights Index scores published by Our World in Data will be incorporated into the CAHRAs selection process to ensure a more comprehensive evaluation of human rights.

4-5 Risk mitigation

In the event that the possibility of a risk as described in OECD Guidance ANNEX II is recognized, we will conduct an on-site inspection within the timeframe specified by the Company and report the results to the person in charge of the supply chain to determine whether risk exists.
We confirmed that there were no Red Flag cases identified in the relevant fiscal year of assessment.

End of the Report

February 1,2026