Refiner Compliance Report – Umicore Precious Metals Refining

Refiner's name	Umicore Precious Metals Refining (UPMR)
Location	Hoboken - Belgium
Report Year-end	2024
Date of Report	18/09/2025
Senior Management responsible for this Report	Management UPMR (Management Team level of Umicore Precious Metals Refining) + Umicore Corporate Security

TABLE 1 : SUMMARY OF ACTIVITIES TO DEMONSTRATE COMPLIANCE

STEP 1 : COMPANY MANAGEMENT SYSTEMS

Compliance Statement with Requirement

UPMR has a management system in place. It complies partially with step 1 “company management systems”.

The management system and internal procedures are applicable to materials with gold, silver and lead.

Following corrective actions were identified, linked to the specific step described:

- Step 1.1. – medium-risk non-conformance :
  - Description: Besides the policies and guidelines described here below, UPMR will have to create a policy or framework that describes more specifically the applicable risks identified for UPMR and the corresponding due diligence and that is made available publicly.
  - Root-cause: The group policy in place (the Global Sustainable Sourcing Policy) does not cover the UPMR specific risk. This was a misunderstanding. A specific PMR responsible sourcing policy will be set-up and made public.
  - Timing: in place the latest 90 days after compliance report date.
- Step 1.1. – medium-risk non-conformance:
  - Description: The policy should also describe the identified requirements for EITI supporting companies.
  - Root-cause: The group policy in place (the Global Sustainable Sourcing Policy) does not cover the UPMR specific risk. This was a misunderstanding. The relevant EITI requirements will be specified in the policy.
  - Timing: in place the latest 90 days after compliance report date.
- Step 1.2. – medium-risk non-conformance:
  - Description: the evidence of the due diligence done must be recorded more systematically, with preference to pdf-converted documents instead of links.
  - Root-cause: Insufficient clarity on how to document the BPS file appropriately.
  - Timing: this is adjusted and has been set in place immediately after audit feedback.

- Step 1.2. – medium-risk non-conformance:
    - Description: the available resources to complete the required due diligence should be reevaluated, both in terms of manpower and tools (see also non-conformance step 2.1)
    - Root-cause: this is a consequence of the all non-conformances noted in this compliance report
    - Timing : evaluation ongoing and conclusion + measures in place the latest 90 days after compliance report date.

1.1.	Has the Refiner adopted a supply chain policy regarding due diligence for supply chains of gold, silver and lead ?

Comments and demonstration of compliance:

Umicore has Group policies in place that are fundamental for our responsible global supply chain and sustainable sourcing: Responsible Sourcing | Umicore . Besides the applicability of those policies to the whole Umicore group, we ask our suppliers to comply with the Umicore Global Sustainable Sourcing Policy: Global Sustainable Sourcing Policy | Umicore. This global policy focuses on the requirements set for the suppliers of all Umicore entities as well as the Umicore entities themselves. The Global Sustainable Sourcing Policy is documented and refers to financing risk, incl. OECD Annex II per step 1.1 of the RGGv9/RSGv2, and ESG factors.

These policies are available on the Umicore website, accessible to all stakeholders.

On top of this, a Supply Chain Security Guideline is used as internal procedure for UPMR. This Guideline is a very detailed description of the due diligence process and is available to be shown upon request. It covers following main topics :

- Scope : best-effort due diligence process for the business unit PMR with specific guidelines based on the specific risks of the business unit PMR combined with alignment of the Global Due Diligence Guideline for Umicore Group,
- Roles & Responsibilities : clear description hereof for all employees directly involved, going from the supply dept., supply managers, compliance and sustainability manager, VP commercial dept. to corporate security, corporate tax and trade compliance. See more detailed description in step 1.2.
- Best-effort due diligence process UPMR – Business Partner Screening (BPS):
    - Standard due diligence track (Know your counterparty (KYC) / Know your material (KYM) / Risk analysis / Result), with focus on:
        - Supplier's structure & organization, incl. management and ultimate beneficial owners
        - Risk identification, covering predominantly OECD Annex II / human rights violation / contribution to conflict / bribery / corruption / money & tax laundering / stolen materials / treatment of waste in breach with regulations / conflict of interest / materials with doubtful origin / adverse impact on local communities, climate and environment / breaching relevant laws & regulations / sanctions
        - Location of operation & origin of materials
    - Enhanced due diligence track, with more in depth screening of identified risks and clear description of the different internal levels of enhanced due diligence

up to the strict EDD requirements as set by the LBMA RGGv9 and RSGv2. Internal due diligence risk levels are determined by the overall screening scoring or the combination of medium/high material risk with medium/high origin risk. Clear criteria are set as from when the strict EDD requirements from RGGv9 & RSGv2 must be applied.
    - Risk mitigation : with guidelines on how to initiate and who to involve in case of active risk mitigation
    - Continuous Improvement : see below
    - Record Keeping : this is addressed as a separate element. All due diligence documents are kept for at least 5 years.
- Documentation & traceability (Know your transaction (KYT)): this implies all chain of custody documents, whereby typically the custom documents, payment transactions contractual agreements, as examples. Other, specific documentation is required depending on the risk level.
- Training : at least once a year a training is organized for the Umicore colleagues involved in the supply chain due diligence process. The Supply Chain Security Guideline forms the basis for these training, with typically focus on updates, point of attention, high risk / red flags,…

Continuous improvement:

The UPMR Supply Chain Security Guideline is yearly reviewed and updated where appropriate. The improvement in 2024, primarily took into account the 3rd party assurers' recommendations, with specific emphasis to enhance the lay-out and to improve the description of the different enhanced due diligence levels. The updated UPMR guideline was finalized during 2024 Q2, incl. training of concerned staff. The guideline is valid as from 01/01/2025, hence applicable for the reporting year 2025 onward.

Organisation & hierarchy:

The Supply Manager, who is the first point of contact to the business partner, has the appropriate expertise to make a first assessment on the ESG & security performance and compliance of the business partner. Depending on the screening scoring or material/origin risk, an enhanced due diligence procedure will automatically be initiated. In case of mined materials, a specific mined material due diligence procedure will be initiated. In both cases, a more in depth ESG assessment is done, with active involvement of the Compliance & Sustainability Manager or the Corporate Security Manager. The identification of a catastrophic or highly adverse Environmental, Social and Governance factor, will in all cases lead to a Red Flag. The risks related to lead (Pb), as well as to different other elements, has been part of the screening since the beginning of our screening procedure. As from reporting year 2024 (1/1/2024 – 31/12/2024) onwards, additional lead specific checks are performed to cover lead specific risks, with cross-check of membership of ILA or ILZSG.

The UPMR Supply Chain Security Guideline is reviewed by Corporate Security and approved by the senior management; it is applicable to the Umicore business unit Precious Metals Refining in Hoboken. The Supply Chain Security Guideline is an internal UPMR document, made available and explained to all staff of the Supply Dept. Because of the specificity of the UPMR Supply Chain Security Guideline and the details that contain confidential information, this document is not made available publicly but can be shown and explained to external stakeholders, upon request. The group policies linked to responsible sourcing are made available (see link on top)

1.2.	Has the Refiner set up an internal management structure to support supply chain due diligence ?

Comments and demonstration of compliance:

A. Internal management structure:

This compliance report describes activities of the business unit Umicore Precious Metals Refining (UPMR). Within this business unit, a proper supporting internal management structure is in place :

- Compliance & Sustainability Manager PMR : the role of Compliance Officer is managed by the Compliance & Sustainability Manager PMR. This person has a relevant science master's degree and more than 20 years of experience in the supply of precious metal bearing materials, both from mining, industries and recycling. The key responsibility of the Compliance & Sustainability Manager is to:
    - have a proper and updated supply chain due diligence in place.
    - assure compliance with the appropriate schemes and standards and be the main contact to the 3rd party assurer.
    - check the conformity, correctness and completeness of the due diligence actions.
    - do the enhanced due diligence & initiate escalation where appropriate.
    - organize and give training to all staff involved.

  The Compliance & Sustainability Manager hierarchically reports to the Vice President of Supply, Sales & Market Intelligence and has regular interaction with relevant corporate functions such as the Corporate Security Manager and the Program Lead of ESG Responsible Sourcing.

- Vice President of Supply / Sales & Customer Services / Market Intelligence : this person leads the UPMR supply dept., the supply planning and budget, and oversees the supply operation. This Vice President hierarchically reports to the SVP of Umicore Precious Metals Refining and also has regular contacts with the Umicore Group Executive Leadership Team (ELT), which is the Umicore Management Board.

On the Umicore Group level, the involvement and responsibilities related to responsible sourcing and due diligence are organised within few corporate departments: Corporate Security, Trade Compliance, Group ESG and Group Tax.

- Corporate Security : the Corporate Security Manager sets out the group guidelines for security and proper governance among all BU's, herewith taking into account the specificities of each operation. Corporate Security offers direct assistance to UPMR for governance and security matters. The Corporate Security Manager has a regular contact with UPMR and is actively involved in the enhanced due diligence process and possible escalation of due diligence files to the Management board, via the Chief Security Officer, who directly reports to the Group Internal Audit. The Chief Security Officer reports to the Security Steerco comprising of several ELT members.
- Trade Compliance : the Trade Compliance Managers control the import to and export from Umicore and all related transactions within the context of sanctions. They set and update the guidelines and requirements in this respect. Trade Compliance offers direct assistance to the UPMR responsible sourcing due diligence for sanction matters. Trade Compliance is directly reporting to the Management Board via the Purchasing & Transportation SVP.

- Group ESG : the Program Lead ESG Responsible Sourcing is a key contact within context of our group responsible sourcing policies and provides direct assistance in case of other ESG matters than Governance & Security. Group ESG is directly reporting to the Management Board via the Director ESG Integration
- Group Tax : the Tax Manager sets and updates the list of tax havens and tax blacklisted countries and offers direct advice in case of tax questions or grey zones. Group Tax is also involved in case of enhanced due diligence or in case of escalations, related with tax.

The Umicore Management board is a team of leaders with a broad and solid background and track record enabling proper oversight of the responsible sourcing activities within Umicore Group : Executive leadership team | Umicore

The connection and interaction between the corporate/group departments and the Supervisory Board (Supervisory board | Umicore) is organized via the Audit Committees : Audit | Umicore. The Audit Committee convenes about 4 times per year and discusses concrete risk cases for Umicore related to fraud, corruption, security, etc. The head of internal audit is the secretary and other appointed members are the CFO and multiple members of the Board of Directors. Corporate security is attending upon invitation.

Besides above, a Code of Conduct Committee is set in place that convenes twice a year to discuss all reported cases of breaches or non-conformities of the expected ethical behaviour and integrity of the employees. Since 2022, the reporting of grievance via the Integrity Line has been added to these cases. The Code of Conduct Committee exists out of members of internal audit, corporate security and human resources. A report results from these meetings. Specific non-confidential info out of this report is included in the annual report, hence reaching the Board of Directors.

B. Training:

In 2024, 2 mandatory trainings were organized for the supply dept. (office personnel and management) actively involved in the supply chain: a main training with recurring focus on updates and audit recommendations within view of continuous improvement, and with special focus on high-risks (LBMA), red flags (OECD) and the enhanced due diligence process. An additional refresher training, to highlight 'points of attention' when preparing and completing the due diligence of a business partner. The training attendance is properly tracked and monitored via the Umicore training platform (MyCampus). 100% of the target group of employees followed both trainings. In total 36 employees.

C. Payment:

Incoming and outgoing payments are only done via the official banking channels. Bank name and bank location are systematically screened in our updated business partner screening. Cash payments are forbidden for the Umicore PMR transactions.

D. Ally with relevant and competent authorities:

Umicore PMR has been allying and interacting with relevant authorities since its existence. Also, within context of responsible sourcing, the Umicore alliances with authorities and associations – other than LBMA - such as the regional waste authority (OVAM), EPMF (European Precious Metals Federation), IPA (International Platinum Association), are fruitful. Such alliances offer the right fora to discuss and align on material classification, applicable regulations or compliance.

E. Record Keeping:

All due diligence documents, which are managed via a Sharepoint Online tool, are kept for at least 5 years. This implies all relevant chain of custody documents and other specific documentations needed for the screening : the BPS file and history, transportation & custom documentation, contract, payment transactions, invoices, SAP data, …

1.3.	Has the Refiner established a traceability system over gold, silver and lead supply chains, including chain of custody mapping and identification of supply chain actors ?

Comments and demonstration of compliance:

UPMR has an onboarding Business Partner Screening procedure for new business partners and a periodic review of the Business Partner Screening for existing business partners. The Business Partner Screening's goal is to provide Umicore a good level of assurance and trust about the reliability of the business partner concerning responsible sourcing, including country of origin inquiry and environmental, social, and governance (ESG) due diligence checks.

The traceability system and checks are 2-folded:

- Before conclusion of business there is a first standard business screening of the business partner. The team of the Supply Dept. prepares the screening with attention to following traceability information:
    - country of incorporation and activity (can be 2 different origins)
    - the origin of the material
    - the material composition and process leading to this material
    - in case of mined material, clear information of the mine for enhanced due diligence.
- Red flags or zero tolerance indicators trigger an enhanced due diligence. (see due diligence process diagram further below under 2.2.E)
- Once business concluded and supply is started and when a shipment is announced, and material sent or arrived:
    - the Umicore Logistics and Transportation Dept. will receive the relevant information for custom clearance or upon arrival of the material for proper tracking of the origin (consignee, port of departure, …). This information will be cross-checked with the information as set in the agreement. Suppliers can only send material to Umicore PMR, if a valid contract reference is in place.
    - The Umicore sampling & assaying dept will check the conformance of the physical aspect with the specifications on the contract and will compose the shipment into 'lots'. A lot is material quantity that will be fully sampled and assayed, leading to an assay report per lot. The final assay results will give extra confirmation on the conformity of the material and if no irregularities occurred (i.e. mixing of stolen materials,…)
    - All information from arrival until settlement is managed in a tailormade SAP system. The logistic documents (i.e. Bill-of-Lading, pro-forma invoice, clearance documents,..) are managed and filed by the Umicore Logistics & Transportation Dept. and can be consulted.

The Compliance & Sustainability Manager PMR conducts regular checks on supply conformity, among other when material with a high-risk due diligence level is monitored or when the composition or origin differs from what is specified in the contract. The Compliance & Sustainability Manager reviews together with the Corporate Security Manager the gold,

silver and lead supply chain due diligence and reports to the management of UPMR on a yearly basis. The result of this internal compliance review is recorded.

1.4.	Has the Refiner strengthened company engagement with gold, silver and lead supplying counterparties, and, where possible, assisted gold, silver and lead supplying counterparties in building due diligence capabilities ?

Comments and demonstration of compliance:

Our Umicore Global Sustainable Sourcing Policy mentions that the Umicore Group expects its business partners to comply with all applicable regulations, such as environment, in all regions where business partners operate and that they have the required licenses and permits in place.

Moreover, Umicore expects its business partners to respect the International Labour Organization's Declaration on Fundamental Principles and Rights at Work and the international law in Human Rights. The business partners are expected not to be complicit in any way in Human Right abuses.

These and other requirements form part of the acceptance criteria that are clearly stated in the supply contract, including a link to the Umicore Global Sustainable Sourcing Policy.

UPMR aims for a long-term, sustainable and value-adding cooperation with reliable business partners and encourages them to source responsibly throughout the supply chain, with focus on ESG and apply proper due diligence. Within this context, a mitigation process is in place and Umicore is prepared for any assistance and best practice sharing that supports a sustainable partnership and to engage with counterparties in supporting them to develop own due diligence processes. Due to the nature of business of UPMR and its specific business model as service provider rather than purely a metal refiner, situations whereby the active engagement by Umicore was requested or accepted by the supplier, never occurred so far.

1.5.	Has the Refiner established a company-wide confidential grievance mechanism ?

Comment & Demonstration of Compliance

All stakeholders (external and internal) are invited to report concerns or complaints, anonymously if desired, about Umicore's business approach, or that of its business partners, using the Grievance Contact Form. This grievance mechanism is part of Umicore's Integrity Line (https://www.umicore.com/en/contact/integrity-line). All grievances are directed to Umicore's Corporate Security department. They register and follow-up on the cases and treat them confidentially to ensure protection of the reporting person against retaliation. The subject of a grievance can refer to the gold, silver or lead supply chains, possible irregularities in financial, ethical or behavioural matters, etc. Recurrent reference is made to the Integrity Line via corporate webinars and during the due diligence trainings.
In 2024, Umicore did not receive any relevant grievance via this mechanism related to the UPMR's activities.

STEP 2 : RISK IDENTIFICATION AND ASSESSMENT

Compliance Statement with Requirement

UPMR has risk identification and assessment procedure in place, which partially complied with step 2 “Risk identification and assessment”.

The internal risk identification and assessment procedures are applicable to materials with gold, silver and lead.

Following corrective actions were identified:

- 2.1. – high-risk non-conformance:
  - Description: the tools and sources used to do a proper screening and to identify risks are insufficient to give confidence the identification being properly done. UPMR will implement the systematic use of CoPilot as per immediate and will implement a more interactive (i.e AI based) TPRM (third party risk mgnt) tool to increase the risk identification success rate.
  - Root-cause : unawareness of the possibility of recently developed AI tools
  - Timing : standard use of CoPilot implemented immediately after audit feedback.
- 2.1. – medium-risk non-conformance:
  - Description: the questionnaires from the Refiner’s toolkit should used more systematically, as-is or modified under certain criteria to be explained.
  - Root-cause: misunderstanding on the expected use of the toolkit questionnaires.
  - Timing: in place the latest 90 days after compliance report date.
- 2.2 – medium-risk non-conformance:
  - Description: the risk identification & classification should be conducted independent from any relevant certification of the supplier.
  - Root-cause: over-expectation of certification being foolproof.
  - Timing: implemented as per immediate after audit feedback.

2.1. Does the Refiner have a due diligence process to identify risks in the supply chain ?

UPMR uses an inhouse developed risk-based approach tool to screen its business partners with a ‘know-your-counterparty’, ‘know-your-material’ and ‘know-your-transaction’ component. The screening of location and origin is embedded in these 3 components.

During the first part of the standard screening, a digital template is to be completed by the Supply Dept. employee who is in contact with the business partner. Following relevant information is collected:

- Company name, registered address, phone/email, country of incorporation, country of activity, management, ultimate beneficial owners, declared activity, bank and bank location are typically obtained via the Company Identification Document that the new business partner is expected to complete or that we can obtain via the business partner’s company website. The use of Dun & Bradstreet® documents is a valid option, but not mandatory.
- An objective numeric scoring is given on the completeness of above data, the company’s incorporation date, the alignment of the declared activity with the material

received, # employees, validity of VAT. Once the country has been selected from the drop-down menu, the scoring of the country of incorporation, activity and bank location are filled in automatically, based on a country risk ranking that is updated at least yearly.
- External basic ESG risk check is done via LSEG World-Check One® on company, management and beneficial owners.
- The Supply Manager, who best knows the business partner via visits and meetings, gives an 'Own Impression' scoring with comment, based on own knowledge and impressions.

Above action leads to an overall numeric scoring. If this scoring is below a set threshold, the Supply Manager can decide and sign-off autonomously. In case the scoring exceeds a first level, enhanced due diligence is triggered automatically, leading to additional screening by the Compliance & Sustainability Manager of UPMR. In case the scoring exceeds a second level, enhanced screening by the Corporate Security Manager is initiated. The enhanced due diligence by the Corporate Security Manager or the Compliance & Sustainability Manager leads to a positive, conditional or negative advice for the responsible Supply Manager.

The enhanced screening implies a more profound security and ESG screening via external databases World-Check® and Amber Road® and via desk research. Additional interviews with or on-site visits the business partner if required. Questionnaires are used, in particular in case of a strict enhanced due diligence, typically in a customized set-up for the specific situation, whereby the LBMA questionnaires for mined and recycled material form a solid reference. (See step 2.3)

In case the offered material is originating from a mine, the mine(s) needs to be disclosed and a mined material screening procedure will be triggered automatically, leading to a specific enhanced due diligence for mined material conducted by the Compliance & Sustainability Manager, with more focus on environmental and social aspects, besides governance aspects. The additional screening is predominantly desk research, whereby NGO's, websites for the mining industry and in the field of mining & minerals ESG are consulted.

Under certain clear conditions, a reduced or "light" business partner screening can be conducted. Main criteria for this are:

- Stock listed companies listed in EU, USA, UK, Canada, Australia, Japan & South Korea
- Companies with a certification of compliance with relevant standard or scheme (LBMA, LPPM, RMI, IRMA, RJC, WGC…)
- Umicore entities supplying to UPMR

Also Umicore entities are screened. Within Umicore Group, each business unit uses its specific due diligence guidelines, focusing on their specific risks, while all respecting the group policies for sustainable and secure supply chains and internal specific group policies such as the Global Due Diligence Guideline or the Global Guideline on AML.

The outcome of a completed business partner screening leads to an approval, rejection/suspension or mitigation.

Our due diligence process has been updated in June 2022 to incorporate an enhanced due diligence for mined material. In the course of 2023, our due diligence process has been internally evaluated to see if it covers the lead supply risk. Some minor updates have been done enabling to do some additional specific checks related to lead (Pb) supply. This is

embedded in our updated Supply Chain Security guideline 2023, which is applicable for reporting year 2024 onwards. In 2024, both the Supply Chain Security guideline and the Mined Material Screening Guideline have been updated with attention to more clarity on the requirements for enhanced due diligence (high-risks, red flags) and more comprehensive decision matrix for mined material.

Once the business partner is on-boarded and can start shipping materials, all transactions related to the shipment, from sending, arrival and settlement are monitored, with following key elements:

- Origin and departure in line with contractual agreements. If not, supplier will be consulted and, if approved by UPMR, origin can exceptionally be modified
- Material type and composition in line with contractual agreements. In case of different material or deviating composition, this will be further investigated to be sure about the integrity of the material.
- Vessel booking & routing
- Payment transactions, incl. supplier's bank and bank location.

Beginning 2025, LBMA noticed a press article with adverse media from a mine that supplies UPMR, and informed UPMR accordingly. This triggered UPMR to carefully consider possible EDD measures and to review the process with the aim to improve the effectiveness of better capturing relevant media in due time, where possible. Above event occurred subsequently to the reporting period and is related to an indirect supplier of UPMR. The last due diligence screening of the supplier involved, was done before this event. UPMR strongly supports the sharing of relevant media between refiners, associations etc.

2.2. How does the Refiner classify identified risks in light of the standards of its due diligence system ?

A. Risk Criteria:

The Red-Flags from the OECD Gold Supplement and the High-Risks and Zero Tolerance risks from the LBMA RGGv9 and RSGv2 form a basic and fundamental reference for the risk criteria used by UPMR. Combined with broader security and ESG risks that are relevant to the UPMR business, the main risk criteria that are identified, can be categorized under following domains:

Environment

- Adverse impact on climate and environment
- Breaching relevant laws & regulations

Social

- Human rights violation
- Contribution to conflict
- Adverse impact on local communities
- CAHRA countries

Security and Governance

- Crime / bribery / corruption / fraud / money laundering / terrorist financing
- Politically exposed persons

- Money & tax laundering
- Stolen materials
- Materials with doubtful origin

B. Country risk ranking:

At least once a year, a country risk ranking is updated, whereby at least following sources are consulted to make an overall scoring for business risk and for conflict & sustainability risk:

Business risk

- OECD country risk ranking
- EU Sanctions
- Corruption Perception Index
- Tax haven countries

Conflict & Sustainability risk

- CAHRA list
- RMI rating
- Yale Environment rating
- Dodd-Frank
- Fragile State Index
- Heidelberg Index
- UNC Human Development risk & UN Socioeconomic sustainability risk

C. Material risk ranking:

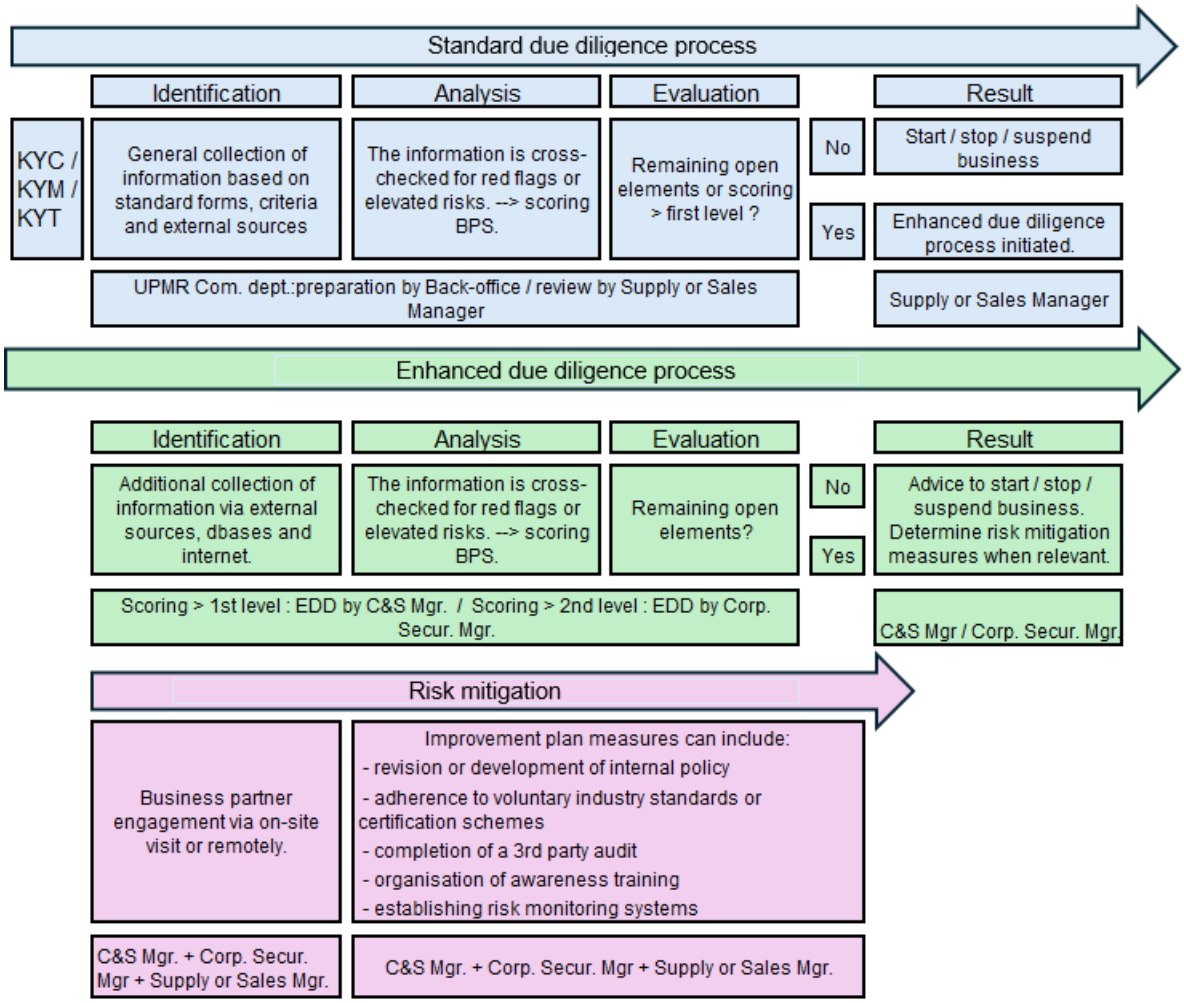
A material risk ranking list is in place whereby the risk level is determined by the type of material (i.e. bullion, sweep, scrap, slag, cake,…) and the grade of the material (% of Au, Ag, Pt, Pd,…). The less transparent the material type (i.e. sweep, bullion,…) and the higher the grade, then the higher the material risk.

The country risk ranking is used for both the automated scoring in our business partner screening (KYC) process (See Step 2.1) as well as the continuous screening of the risk of the incoming materials (KYM) in our SAP system. A matrix is developed whereby the country risk and material risk are combined to result in a low / medium / high due diligence level. In case a high due diligence level is obtained, the supply will automatically be blocked in our systems and can only be released after additional screening and approval by the Compliance & Sustainability Manager.

D. Additional risk identification for mined material:

For mined materials, an additional 'mined material screening' is in place to analyse and identify additional ESG risks, related to mining activities. For this screening, the standard screening is extended with more in dept desk screening of the mine in media, NGO platforms (i.e. Amnesty Intl, UNICEF, Human Rights Watch, Offshore Leaks Database, Anti-Slavery Intl, OECD Watch, Environmental Justice Altas,…), mining Industry platforms (Mines & Communities, Mining.com, Mining Watch Canada, …).

E. Risk classification:



During the standard screening, following indicators lead to a first enhanced due diligence:

- Country risk rankings of (very) high / escalation / forbidden / tax haven
- Red-flags or High-risk indicators determined via software platforms World-Check (PEP, fraud, corruption, crime, laundering, bribery, sanctions, ESG high risks) or via E2Open (sanctions)
- Incomplete information or bad 'own impression' of the Supply Manager

A first enhanced due diligence is conducted by the Compliance & Sustainability Manager or the Corporate Security Manager, leading to a positive/negative/conditional advice.

Following conditions lead to a mandatory on-site visit:

- Material and origin both lead to a high-risk due diligence level, and
- There is relevant adverse media on location/supplier/material, and
- There are open questions and the supplier is lacking responsiveness

Following 2 scenarios lead to a strict EDD as described in RGGv9 and RSGv2 (mandatory on-site visit with prescribed questionnaire)

- Scenario 1
    - There are known Zero Tolerances
- Scenario 2

- The supplier UPMR business partner screening leads to a scoring exceeding the 2nd level, or the supply has a UPMR high-risk due diligence level (combination material / location), and
- There is at least 1 location high-risk and 1 supplier high risk (as described by RGGv9 or RSGv2)
- The supplier is NOT stock listed and
- The supplier is NOT conformant to a relevant responsible sourcing standard or scheme.

F. Elevated and High-risk supplies in 2024.

In 2024, UPMR received gold, silver and lead containing materials from 10 CAHRA countries. The materials received were end-of-life e-scrap or recyclables from recognized recyclers or low grade mined materials or mined residues from a stock-listed and recognized LSM mining company, active outside the CAHRA regions. 2 of these CAHRA countries were also sanctioned countries: UPMR received mined materials from a recognized mining company active in the non-occupied regions of a sanctioned country. This supply was approved by the Management Board, after appropriate enhanced screening and proper screening by Trade Compliance of specific business transaction against the international sanctions imposed. UPMR also received end-of-life e-scrap from another sanctioned country after enhanced due diligence and screening by Trade Compliance against international sanctions.

Besides above, we received material from 7 countries with another high-risk classification than CAHRA. The materials received were end-of-life scrap materials from recognized recycling companies, mine materials from an established LSM mine or by-products from established copper or primary refiners.

In total UPMR received material from 36 suppliers out of high-risk locations.

2.3. Has the Refiner undertaken EDD measures for identified high-risk supply chains ?

Comment & Demonstration of Compliance

Escalation procedures have been installed to involve the Compliance & Sustainability Manager and the Corporate Security Manager and in a number of cases the management of UPMR and the Chief Security Officer. Ultimately escalation up to the Management Board can be required in case of a negative advice or in case of some specific sanctioned countries. More specifically, escalation and involvement of Management Board will happen when a negative advice of the Compliance & Sustainability Manager or the Corporate Security Manager is questioned or in case the BPS scoring leads to an escalation scoring or implies a strictly sanctioned country.

The decision after such escalation could lead to mitigation of the risk (in the highest risk category to an independent audit or a visit on site) or could lead to disengagement.

The Compliance & Sustainability Manager organizes together with the Corporate Security Manager a yearly internal compliance review. Results of the compliance review are reported to the management of UPMR and the Chief Security Officer.

In the course of 2024, following updates have been set in place:

- Clear distinction between the different enhanced due diligence levels (internal due EDD vs strict EDD for high-risk supplies as per RGGv9 and RSGv2, step 2.3)

The same due diligence process is used for materials from intermediate refiners and traders. In case a material with elevated risk (internal EDD), knowledge of the producing refiner is a prerequisite, for additional screening by UPMR. In case of a high-risk supply from an intermediate refiner, the strict EDD measures as described in RGGV9/RSGv2 step 2.3 will be followed. For UPMR, most of the possible intermediate refiners are active in the base metals (Pb, Cu, Zn refiners).

During the reporting period 2024, UPMR did not source high-risk supplies (as defined in the RGGv9 and RSGv2 step 2.3) with a combined location high-risk issue and other high-risk issue and therefore no strict EDD procedure as set by RGGv9 or RSGv2 step 2.3 were required. UPMR performed the required due diligence procedures for the elevated risk business partners following the due diligence requirements in the UPMR Supply Chain Security Guideline and as described in step 2.2.

STEP 3 : RISK MANAGEMENT

Compliance Statement with Requirement

UPMR has a risk management system in place, which fully complied with step 3 “Risk Management”.

The risk management system is the same for gold, silver and lead.

3.1. Does the Refiner have a process to respond to identified risk by either (i) mitigating the risk while continuing to trade, (ii) mitigating the risk while suspending trade or (iii) disengagement from the risk ?

Comment & Demonstration of Compliance

Enhanced due diligence and escalation procedures are in place to involve the Compliance & Sustainability Manager and the Corporate Security Manager and in certain situations the management of UPMR and the Chief Security Officer.
The advice of the Compliance & Sustainability Manager and the Corporate Security Manager and the subsequent conferred decision of the management of UPMR could lead to mitigation of the risk (in the highest risk category this can include an independent audit or a visit on site) with suspension or cautious continuation of the cooperation or could lead to disengagement. For specific escalation files, linked to sanctioned countries, approval by Trade Compliance and the Management Board of Umicore is required.

The involvement of the higher management of UPMR implies the evaluation by a Supply Committee of the specific case. This committee exist of a dedicated team of the senior management of UPMR. Ultimately and if required, a case can escalate to the Management Board of Umicore, via the Chief Security Officer, for advice/decision.

In general and for all metals and minerals managed under the management system, in total 21 new, possible business partners were rejected before engagement, after our due diligence screening in 2024.

No mitigation actions were taken for or accepted by any rejected supplier. Due to the nature of the business of UPMR ad its business model, active mitigation by UPMR is uncommon: as a service provider, UPMR treats materials of other recyclers, smelters, refiners, manufacturers. Because of this, most of our contracts are rather short/mid term and the supplier is barely accepting UPMR to actively support in mitigation, if this were to be the case.

1 formal escalation files was triggered in 2024, involving approval of Trade Compliance and the Management Board, due to supply from 1 Ukraine based company, not located in the occupied regions and not sending high-risk materials. A positive advice was submitted after proper due diligence by the Compliance & Sustainability Manager and Trade Compliance.

STEP 4 : INDEPENDENT THIRD-PARTY ASSURANCE

Compliance Statement with Requirement

UPMR has engaged for an independent third-party assurance, which fully complied with step 4 “Independent Third-Party Assurance”.

The scope of the assurance engagement is the same for gold, silver and lead.

Comment & Demonstration of Compliance

UPMR engaged the services of the assurance provider ARCHE Advisors Inc. Prior to this engagement, clear agreements have been made on the scope and process of this independent third-party assurance in order to safeguard independence, neutrality and to avoid any possible interference or conflict of interest. The neutrality and independency of ARCHE Advisors Inc is ensured.

The 2024 assurance was a “reasonable assurance”, after 2 years of limited assurance.

The assurance testing, feedback and reporting deliverables were made available in due time as agreed within the context of the Incident Review Process. The Independent Assurance Report for gold, silver and lead is available on our company website.

The 2024 (FY 2023) audit report unveiled 5 low-risk NC’s. 2 were solved (in time country risk ranking update in the systems / further improvement of our guideline in line with RGGv9/RSGv2 requirements). The 3 others are under control and are planned in the further automation road map of our due diligence process (manual change in the due diligence file should trigger an automatic review / automatic correction of origin/departure in SAP / automatic alert to update existing due diligence file in case country risk ranking changes).

TABLE 2 : MANAGEMENT CONCLUSIONS

Is the refiner in compliance with the requirements of the LBMA Responsible Gold Guidance version 9 and LBMA Responsible Silver Guidance version 2 for the reporting period ?

PARTIALLY Comment:

Umicore Precious Metals Refining (UPMR) implements management structure, processes and practices to meet the requirements of the LBMA Responsible Gold Guidance v 9. and the LBMA Responsible Silver Guidance v 2. as explained above in Table 1, for the reporting year ended 31 December 2024.

Umicore Precious Metals Refining (UPMR) is committed to continuous improvement, and the corrective actions resulting from the Incident Review Process will be implemented effectively and with priority.

In 2024, there were no disengagements from existing suppliers. 21 new, possible suppliers were rejected.

TABLE 3 : OTHER REPORT COMMENTS

Comment:

Most of the lead (Pb) supply comes to UPMR in materials together with precious metals. But independent of the possible precious metal content, the lead supply to UPMR is subject to the same due diligence process as described in this document. The lead supply in materials without precious metals arrived from well established companies within Europe, during the reporting period.

NAME : Steven Art
TITLE : Compliance & Sustainability Manager PMR
DATE : September 18th 2025
SIGNATURE :

Steven Art (Signature)

Digitally signed by Steven Art (Signature)
Date: 2025.09.18 17:00:54 +02'00'