

Transamine Group ESG & Sustainability Policy

1. Introduction

Originally founded in 1953, Transamine SA (Transamine) is a privately owned company within the non-ferrous metals trading industry, dedicated to worldwide physical trading of non-ferrous metals and minerals, as well as precious metals, refined and semi-refined copper.

This policy is enacted by Transamine's senior management, it is applicable across all entities within Transamine's group and is subject to regular review.

2. Purpose

We believe topics related to environment, social and governance (ESG) are critical to consider with regards to our business and in the wider global context of development.

As metals play a particular role in the transition towards a greener economy, it is key that the benefits this will bring are not mitigated by poor ESG management and practices. Companies engaged in this sector must ensure that they are responsible actors with regards to their environmental and social impacts.

Transamine is committed to conducting physical metals trading in a sustainable, ethical, and transparent manner, by implementing the United Nations Guiding Principles on Business and Human Rights and the OECD Due Diligence Guidance for responsible Business Conduct.

This policy outlines our principles and practices for minimizing environmental impact, promoting social responsibility and ensuring long-term economic value across our trading and logistic operations.

This policy also sets out the standards that are upheld by Transamine with regards to ESG related matters and expectations from our counterparties.

3. Scope

This policy applies to:

- All physical non-ferrous metals (Copper, Nickel, Zinc, Tin, Lead), precious metals and battery metals traded by Transamine;
- All departments based at Transamine head office in Switzerland;
- All entities within Transamine's group, its representative offices and agents.

4. Sustainability Commitments

4.1. Social Commitments

Transamine is committed to:

- Comply with the UN Guiding Principles on Business and Human Rights;
- Ensure supply chain transparency by conducting due diligence in line with the OECD Guidelines for Multinational Enterprises and the OECD Due Diligence Guidance for Responsible Business Conduct;
- Not purchasing metals linked to conflict, child labour or human rights abuses, by refusing to trade with non-compliant suppliers;
- Support fair labour practices and health, safety and working conditions standards;
- Engage stakeholders to share knowledge and sustainable practices in the industry.

4.2. Environmental Commitments

Transamine is committed to:

- Promote responsible sourcing;
- Track and minimize our carbon footprint by calculating Scope 3 GHG emissions;
- Avoid trading metals linked to environmental harm;
- Not engaging in business with artisanal small mines.

4.3. Economic Commitments

Transamine is committed to:

- Integrate ESG risk assessments into trading and investment decisions;
- Maintain compliance with all applicable laws, guidelines, environmental and human rights relevant regulations;
- Support transparency and traceability;
- Maintain due diligence processes and a management system to avoid contribution to adverse impacts.

5. Cross-Industry Engagement

Regulations and best practices related to ESG are ever-changing and companies must anticipate expectations that will impact them in the future. To this end, Transamine is a member of the SUISSÉNÉGOCE. This ensures that latest developments with regards to ESG topics, expectations of counterparties, governments and non-governmental organizations, are well understood and considered within the most relevant context.

6. Implementation and Responsibilities

Transamine senior management shall set sustainability goals, ensure ESG integration, determining business strategies and approve Transamine group's policies.

Trading and operations teams shall consider sustainability in counterparty selection, deal structuring, and transport planning.

The legal & compliance department shall monitor adherence to due diligence standards and ESG frameworks and provide guidance. It performs risk assessments through KYS/KYC due diligence processes.

7. Monitoring and Reporting

Key sustainability indicators (e.g. calculation of Scope 3 emissions in line with the GHG Protocol Corporate Standard) will be tracked and reviewed yearly.

A regular internal assessment shall be performed to ensure compliance with this policy and the identification of areas of improvement.

This policy is reviewed yearly and updated if needed, to reflect the industry best practices and regulatory changes.

Employees are expected to uphold the principles set out in this policy and report any sustainability-linked concerns to senior management.

8. Decision making

ESG related decision-making is led by Transamine's senior management within the company's headquarters in Geneva, Switzerland.

9. Communication

This policy is available on Transamine's website (www.transamine.com).

Geneva, April 2026