TRANSAMINE SA

REPORT ON THE FULFILLMENT OF DUE DILIGENCE AND TRANSPARENCY OBLIGATIONS ON MINERALS AND METALS FROM CONFLICT-AFFECTED AND/OR HIGH-RISK AREAS AND CHILD LABOUR

ACCORDING TO ARTICLES 964j-l OF THE SWISS CODE OF OBLIGATIONS AND THE ORDINANCE ON DUE DILIGENCE AND TRANSPARENCY IN RELATION TO MINERALS AND METALS FROM CONFLICT-AFFECTED AREAS AND CHILD LABOUR (DDTrO)

Reporting Period: 2025

1. Introduction

Transamine SA ("Transamine") is a privately owned company within the non-ferrous metals and minerals trading industry, originally founded by Jean Adamian in 1953 in Paris, with head office in Geneva, where the company (formerly Transamine Trading SA) was incorporated in 2006.

Transamine is committed to make its best efforts to continuously improve due diligence processes with respect to child labour, human rights and broadly ESG concerns, by engaging with suppliers through supply chain traceability efforts, transparency and communication.

2. Due Diligence and Transparency on Minerals and Metals from Conflict-Affected Areas and Child Labour

The Swiss due diligence and transparency obligations are set out in the Swiss Code of Obligations ("CO"), articles 964j-l and the corresponding ordinance ("DDTrO"). The regulation requires due diligence to be based on the internationally recognized provisions of the ILO Convention and the publishing of a yearly report by Swiss companies which fall into DDTrO scope. This report covers Transamine's activities during the reporting year 2025 with respect to the following topics:

1. Child Labour

Transamine falls into scope of the provisions regarding child labour (article 964j CO and article 5 DDTrO) and must comply with the child labour supply chain due diligence and reporting obligations for services where a risk of child labour might be identified or cannot be excluded, due to the nature of the products traded and the countries where some business partners operate.

Based on Transamine due diligence assessments, no identified issues with respect to non-compliance with international regulations on child labour were observed during the reporting period 2025.

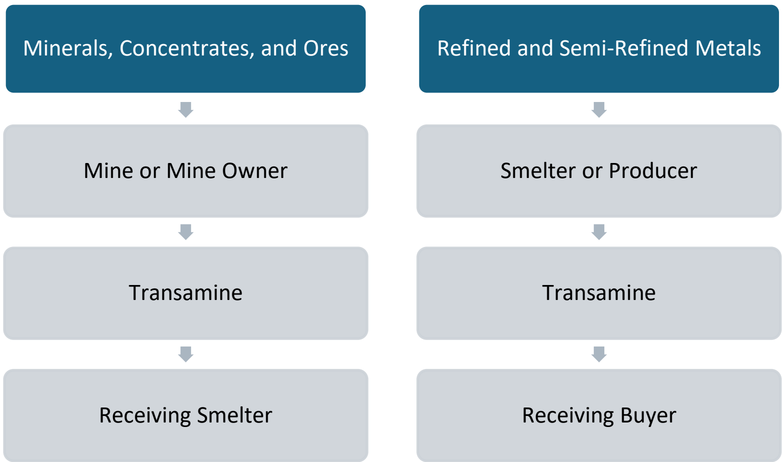
2. Reporting on Minerals and Metals

Transamine does not fall into scope of minerals and metals reporting obligation (article 964k para. 3 CO, article 16 DDTrO and Annex 1 of the DDTrO) with regards to importing or processing in Switzerland of tin, tantalum, tungsten or gold from conflict-affected and/or high-risk areas.

Based on the registered quantities of materials sold, Transamine did not import nor process any conflict-minerals in Switzerland during the reporting period 2025.

3. Transamine business activities and supply chains

To ensure visibility for risk assessments to be performed, the mapping of our own supply chains is a key element. Transamine's supply chain can be summarised as follows:



Within our supply chain, we interact with the following service providers and business partners:

- Mines
- Warehouses for the blending or storing of materials
- Logistic service providers (e.g., trucking companies, shipping companies)
- Smelters and refineries

4. Transamine policies related to child labour

- ESG & Sustainability Policy applying to all entities of Transamine Group, updated in May 2026. The policy outlines our sustainability and cross-industry engagements

- Business Partners' Code of Conduct, updated in April 2026, requiring our business partners to act in accordance with applicable laws, rules and regulations of the countries from where they operate and to comply with the fundamental frameworks of the industry

- Supply Chain Policy dated as of May 2026 expressing our commitment to promote ethical business practices

- Transamine Employees Code of Conduct, updated in January 2026, addressing integrity, transparency and professional behaviours.

Transamine's policies are aligned with international frameworks, including the OECD Due Diligence Guidance for Responsible Business Conduct, the UN Guiding Principles on Business and Human Rights, the ILO Conventions No. 138 and 182, and the ILO-IOE Child Labor Guidance.
They are regularly updated and communicated to business partners through Transamine's website (www.transamine.com) and contracting.
Additionally, business partners are requested to confirm they read and understood the Business Partners Code of Conduct when completing our Know Your Supplier (KYS) and Know Your Customer (KYC) questionnaires.
All ESG assessments, KYS / KYC questionnaires and findings are stored in Transamine's internal drive.

5. Transamine due diligence approach

The key elements on which Transamine relies in its approach to supply chain due diligence can be summarized as follows:

- Compliance with Swiss Laws and international frameworks
- Data and information gathering and analysis (questionnaires, discussions with counterparties)
- Mapping with respect to countries and products
- Country and product risk screening
- Check that child labour requirements are complied with
- Risk mitigation
- Organization of proper governance
- On-site assessments
- Monitoring
- Reporting

Our defined objectives:

- Regular updates of policies
- Improvement of internal processes
- Constant development of the communication with business partners
- Raising awareness internally (to group employees) to human rights issues
- High level of transparency in the supply chain management
- Continuously setting new targets

Transamine due diligence governance organization:

To address ESG issues, it is important to have the ability to effectively communicate within the the company and the group. Transamine's governance with respect to due diligence is composed of four levels:

- Board of directors
- Top management (shareholders - CEO)
- Senior management (traders)
- Legal and compliance department

6. Risk identification

Assessing child labour in a supply chain means evaluating where the risk exists, whether child labour is occurring and how a company prevents and addresses this issue.

At Transamine, the first evaluation process is performed when onboarding new suppliers or business partners and is subject to regular re-evaluation. The regularity of re-evaluations is determined using a risk-based approach with priority being given to such counterparts who score a "high risk" and on mapping the countries where our suppliers and other business partners source from or operate. This is then compared against the UNICEF Children's Rights in the Workplace Index, with the following distinction:

- With regards to ores and concentrates, the country of origin is determined and assessed as where the mining site is located
- With regards to refined metals, the country of origin is determined as being where the refining or smelting process has taken place

A risk screening-based verification is the most effective tool to highlight concerns and improve visibility on such risks.

Information received shall be cross referenced with publicly available information online (adverse press). Then, it is important to verify whether the entity is subject to any restrictions, through desktop research. This will help to determine whether there are concerns regarding child labour or any violation of human rights, or generally any adverse information, previous incidents or allegations against the company, which would need to be evaluated before proceeding further.

An additional due diligence is performed in case the country of origin for a product or service requires an enhanced due diligence response (as indicated in the UNICEF Workplace Index).

7. Management of supply chain risks

In situations where a particular issue has been detected, Transamine determines the most effective method to address such a risk.
Those measures can range from supporting business partners to address certain areas where policies or information may be lacking, requesting to perform an audit locally, or requesting relevant certifications. If no appropriate measures are taken by suppliers, the commercial relationship can be re-evaluated accordingly.

8. Transamine grievance mechanism

A link to the alert mechanism for counterparties and employees to raise concerns is available on Transamine's website (www.transamine.com)

9. Supply chain due diligence processes during the reporting period 2025

During the last reporting period we strengthened processes by enhancing risk assessments with additional instruments:

- Updating of policies, business partners code of conduct and due diligence questionnaires
- On-site visits on a case-by-case basis, to check operational practices against declared policies, environmental and safety measures in place, social and community engagement, compliance with governance and KYC requirements
- Requesting additional information or documentation to ensure better visibility
- Verifications on whether counterparties issued a public statement or press release
- Continuous monitoring and adverse news screening
- Improved communication with stakeholders

10. Following actions

- Reinforce risk identification
- Use of more sophisticated screening solutions to highlight concerns relating to negative press on human rights issues, sanctions, political exposed persons, etc. to improve our visibility on such risks
- Request our suppliers to complete self assessment questionnaires and human rights assessments, in addition to KYS and KYC questionnaires
- Establishment of regular dialogues with suppliers to better understand how risk is managed

11. Communication to business partners

We communicate our expectations through our Business Partners' Code of Conduct (https://www.transamine.com) and while completion of KYS or KYC due diligence.

This report has been approved by the Board of Directors of Transamine SA

Geneva, 30 June 2026