

Supply Chain Policy for Raw Materials for Gold and Silver

With respect to procurement of raw materials for gold and silver by Mitsui Kinzoku Group, we will avoid any procurement associated with:

- Being a part of organized and extensive human rights violations
- Financing of conflicts
- Money laundering
- Bribery, and fraudulent and false representation of country of origin of gold and silver
- Financing terrorists
- Illicit transactions

Further, we will commit to our responsibility toward the environment and sustainability, and promote procurement management of raw materials for gold and silver.

1. Establishment of Management Structure

We will establish a structure to implement a supply chain traceability system for raw materials for gold and silver, appoint persons responsible for the supply chain and compliance, clarify responsibilities and authorities, and promote responsible procurement management of raw materials for gold and silver.

2. Implementation of Educational Training

We will plan and implement education and training for all employees involved in procurement of raw materials for gold and silver on an ongoing basis.

3. Assessment of Supply Chain Due Diligence

We will conduct activities to procure raw materials for gold and silver according to Mitsui Kinzoku Group's process that is in line with the requirements of the London Bullion Market Association's (LBMA) Responsible Gold Guidance and Responsible Silver Guidance. We will conduct supply chain due diligence for purchased raw materials for gold and silver on an ongoing basis, get a complete view of the supply chain, and effectively conduct risk assessments.

4. Monitoring and Recording of Transactions

With respect to the supply chain and risk profile, we will verify the consistency between the information obtained and the actual transactions, and appropriately store and manage such records.

5. Measures Against Identified Risks

If a procurement is identified as “High Risk” as a result of risk assessment, we will take measures to mitigate the risk. If the risk cannot be mitigated, the person responsible for the supply chain will make a determination to immediately cease the purchase of raw materials.

6. Communication

We will build and promote a structure in which all employees and external stakeholders can anonymously raise concerns regarding the supply chain of raw materials for gold and silver as well as newly identified risks.

7. Third-Party Audits

We will be audited by a third party in accordance with the LBMA’s audit guidance, obtain a third-party guarantee every year, and report the audit results to the LBMA.

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Mitsui Mining & Smelting Co., Ltd.