DOWA Metals & Mining America, Inc.
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DOWA Metals & Mining America Inc.

DMMA 2025 OECD Compliance Policy Statement

In 1884, DOWA Metals and Mining Co., Ltd. (**DMM**), a **DOWA** Holdings Co. Ltd. Company (**DOWA Group**), began mining Kuroko (Black Ore) at the Kosaka Mine in Akita, Japan. In the f1980s, through mining investments and joint ventures, their business evolved from a Nonferrous Metals Mining Centered Structure to a unique Nonferrous Metals Smelting and Recycling Complex, centered on **Kosaka Smelting and Refining Co. Ltd**., and a worldwide material collection network coordinated with the Environmental Management & Recycling Business (**DOWA ECO-SYSTEMS Co. Ltd.**).

In the 1990s**, DMM**, a top-class nonferrous metals smelter, and Tanaka Kikinzoku Kogyo K.K., (**Tanaka**) a world-famous platinum group metals (**PGM)** refiner, established Nippon PGM Co. Ltd., Japan (**NPGM),** combining over 100 years each of technical experience and expertise, created a unique and environmentally sound **PGM** recycling process known as the *ROSE Process*. Today, utilizing 140 years of Mining/Smelting Expertise, Unique Technology Development, Modernization and Expansion into New Fields, **DOWA Group/Network Companies** (**DG/NC**) recover more than 20 types of metals, and continues to support Japan's economic growth.

DMM purchases **PGMs**, primarily sourced from spent catalytic converters (**CC**)/**CC** materials, domestically and from Asia, Europe and the Middle East. DOWA Metals & Mining America, Inc. (**DMMA)** located in NJ, purchases **PGMs** primarily sourced from spent **CC**/**CC** materials in Central, North and South America. These materials are delivered to NPGM USA Inc. (**NPGM USA**) in PA for initial processing and assay sampling. All materials are sent to Japan to be processed at the world's largest pyrometallurgical plant, located in Kosaka, Akita Prefecture, where final assays are determined. **DMM** sells precious metals exclusively to companies in Japan.

Since 2019, **DMMA** has offered premium refining services for **CC**s on an assay basis, and is engaged in business transactions with a client/counterparty/customer/supplier (**CCS**) involved in the recycling of non-ferrous precious metals (primarily the purchase of previously de-canned **CC** materials) that are sold upwards to their parent company **DMM**. **DMMA** has developed, implemented, monitors, and updates as necessary, an effective anti-money laundering, countering the financing of terrorism, supply chain due diligence (**AML/CFT/SCDD)** Compliance Program (**CP**) that is primarily based on:

- Bank Secrecy Act **AML**/**CFT** Program, 31 CFR Part 1027, Financial Crimes Enforcement Network guidance (Four Pillars of an effective **AML/CFT/SCDD CP).**

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- Section 1502 of U.S. Dodd Frank Act (requiring responsible minerals sourcing).
- Organization for Economic Cooperation and Development's 2016 Guidance for Responsible Supply Chain of Minerals from Conflict Afflicted and High-Risk Areas **(CAHRA)-** Five Step Framework (UN Guiding Principles of Business and Human Rights) and Annex II Risks, utilized by International Associations, Markets, Organizations, etc., i.e., London Platinum and Palladium Market (**LPPM**) Responsible Sourcing Program and Responsible **PGM** Guidance V5 for Mined and Recycled Materials.
- DOWA Environmental, Social and Corporate Governance (**ESG**).

The **CP** is reasonably designed to prevent **DMMA** from being utilized to facilitate money laundering and terrorist financing activities, and to combat systematic/widespread human rights abuses (child labor, forced labor, human trafficking, etc.), war crimes or other serious violations of international humanitarian law, crimes against humanity or genocide, associated with the extraction, transport or trade of recycled metal/metal materials, direct or indirect support to legitimate non-state armed groups, corruption, or contributing to conflict; and other criminal activities such as theft, etc., through the purchase and sale of covered goods. **DMMA** has established a management structure and framework to support **AML/CFT/SCDD** efforts, by establishing risk-based policies and procedures that define governance, roles and responsibilities, internal audit requirements, effective communication, and senior management review as per the adopted policy.

Additionally, it has meaningful client/counterparty/customer/supplier (**CCS**) identification, know your **CCS**, transaction monitoring, and supply chain due diligence and traceability procedures in place. **DMMA** has established a multi-prong process (focused on business line scoring of products, regulatory, services, **CCS**, geographic, that include **CAHRA**, and operational risk factors) to identify and manage risks in the supply chain. Additionally, it uses eight factors, that include CAHRA and domestic/international criminal/civil litigation history in its **CCS** Risk Rating Methodology**. DMMA's CP** (independently audited every 12-18 months) was assessed (December 2025) by Arche Advisors, which provided assurances of the company's **AML/CFT/SCDD Compliance Policy.**

DMMA is committed to creating a resource recycling society, enhancing products/services that reduce social/environmental resources, responding to climate change, protecting the environment, ensuring occupational safety and health, increasing organizational power, promoting risk management, strengthening corporate governance and driving data utilization. **DMMA's ESG** mission and vison are included in its Code of Business Ethics and Conduct, Employee Handbook, Responsible Sourcing Compliance Report and Responsible Procurement Policy. **DMMA's ESG** and **AML/CFT/SCDD** responsibilities drive a culture of compliance, ensures

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transparency and provides internal and external reporting mechanisms. Every **DMMA** employee has an independent obligation to conduct business activities in a manner consistent with **DMMA's** Core Values, applicable laws/regulations and report suspicious activity.

To ensure stakeholders have a consistent point of contact (**POC**) to raise all ethics and compliance related questions/concerns without fear of retaliation or other negative consequences, the Chief Compliance Officer (**CCO)** has been designated the principal **POC**. Employees can also raise these matters directly with a supervisor, senior management, or **CCO** (in person, telephonically or by completion of the Report of Suspicious Activity. Additionally, **DMMA** maintains an Ethics Hotline/Anonymous Tip Line (866 494-3161 and entering **DMMA** Pin # 4200), as an alternate reporting mechanism for external/internal stakeholders.

DMMA communicates on its **CP i**nternally with its employees**, CCSs, DG/NC, and** externally with other stakeholders. **DMMA** publishes its commitment to compliance, responsible procurement and whistle blowing policy on its website (**DMMA** Responsible **PGM** Procurement Policy), so that all internal and external stakeholder are aware of the policy and are able to contact **DMMA** to make inquiries or report on matters related to ethics, integrity, etc.

DMMA's 2025 **OECD** Responsible Sourcing Compliance Report, Compliance Policy Statement and Responsible **PGM** Procurement Policy are Available at https://dmmamerica.com/our-services/