DOWA METALS & MINING AMERICA

DOWA Metals & Mining America, Inc.
109 Connecticut Dr
Burlington, NJ 08016
TEL: +1(609) 900-3692

DOWA Metals & Mining America Inc.
DMMA CY 2025 Compliance Report - OECD 5 Step Framework
Responsible Sourcing Standard Utilized by International Associations/Markets/Organizations

Background

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 1980s, 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.**), including:

- Precious Metals (**PM**) and Copper Smelting and Refining
- Platinum Group Metals (**PGM**) Smelting
- Zinc Smelting and Refining
- Resource Development and Raw Material Procurement – Tizapa and Los Gatos Mines in Mexico

Through its resource development and raw material procurement, **DMM** develops mineral resources to secure stable, long-term sources for the **Akita and Kosaka Smelters**.

In the 1990s**, DMM**, a top-class nonferrous metals smelter, and Tanaka Kikinzoku Kogyo K.K., (**Tanaka**) a world-famous **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** (**DG/NC**) recovers more than 20 types of metals, and continues to support Japan's economic growth.

DMM & DOWA Group/Network Locations & Supply Chain

DMM, headquartered in Tokyo, Japan, has offices in Canada and Mexico (mining) and the Czech Republic, Germany, Spain, Thailand (zinc processing) and the United States (**recycling**).

Recycled Materials

- **DMM** purchases **PGMs**, primarily sourced from spent catalytic converters (**CC**)/**CC** materials, domestically and from Asia, Europe and the Middle East.

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- **DMM** America Inc. (**DMMA**), located in New Jersey, 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 Pennsylvania for initial processing and assay sampling,

Material Smelting & Refining

- All **PM** 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.
- Mined/purchased Zinc materials are secured as stable long-term sources for the **Akita and Kosaka Smelters**.
- **DMM** sells **PM** exclusively to companies in Japan.

Since 2019, **DMMA**, located in Burlington, NJ, has offered premium refining services for **CCs** on an assay basis. **DMMA** engages in business transactions with a client, counterparty, customer and or supplier **(CCS**) involved in the recycling of a variety of non-ferrous **PM**. While **DMMA** purchases **CCs** for de-canning, most of its business involves the purchase of materials previously de-canned by its **CCS's**. The materials are sold upwards to their parent company **DMM**. **DMMA** partners with **NPGM USA** in Pottstown, PA, to provide trustworthy sampling assays of the de-canned materials, and **NPGM** in Japan for final sampling assay.

The mining/purchase/sale of metals/**PM**, as well as the purchase of recycled materials containing **PGM**, specifically palladium, platinum, and rhodium (also referred to as "covered goods"), are subject to domestic/international laws, regulations/policies/procedures and/or standards, primary related to countering money laundering (**ML**), terrorist financing (**TF**), and human rights (**HR**) abuses (**HRA**) (child labor, forced labor, human trafficking, etc.).

DMMA has implemented, monitors, and updates as necessary, an effective Bank Secrecy Act (**BSA**) Anti-Money Laundering and Countering the Financing of Terrorism **(AML/CFT)** and **Supply Chain Due Diligence (SCDD)** Compliance Program (**CP**) in connection with the **PGM** it buys and sells.

NPGM USA is not considered a **PMD**, and therefore not required to develop or implement a written **AML/CFT Program.** However, since **NPGM USA** shares a pipeline with **DMMA** upstream to **DG/NC**, and interacts directly with **DMMA CCS**/**CCS** representatives during delivery of materials to **NPGM USA**, it has developed and implemented a **SCDD CP** that supports **DMMA's** Know Your **CCS** (**KYC**) efforts and **DG/NC's** high standards of **SCDD**.

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Step 1: Establish Strong Company Management Systems

Compliance Statement with Requirement:

DMMA has adopted a holistic approach in establishing strong company management systems and is committed to conducting robust **PGM SCDD:**

- Adherence to domestic and international federal/state/local laws.
- International recommendations/standards, i.e., Financial Action Task Force's **(FATF)** comprehensive framework of measures to prevent **ML/TF** activities and the harm they cause to society.
- International best practices/standards i.e., Organization for Economic Co-operation and Development's **(OECD**) Five Step (**5SF**) **DD** process aligned with **UN** Guiding Principles on Business and Human Rights.
- Related industry recommendations, i.e., London Platinum and Palladium Market **(LPPM)** Responsible Platinum & Palladium Guidance **(RPPG)** and Responsible **PGM** Guidance V5 (**RPG5**) for Mined and Recycled Materials, primarily based on **OECD 5SF.**

We have fully complied with Step 1: Establish Strong Company Management Systems

Comments and Demonstration of Compliance

DMMA has Established Strong Company Management Systems, and developed and implemented a written **AML/CFT/SCDD CP**, which includes the guidance, rules, and information included in its Compliance Policies and Procedures Manual ("Compliance Manual"). The Manual is reasonably designed to prevent **DMMA** from being utilized to facilitate **ML/TF/HRA** through the purchase and sale of covered goods**. DMMA** deeply values integrity, professionalism, and accountability, including strict, compliance with its **CP**, which all relevant employees are required to follow.

DMMA's CP incorporates the four pillars of an effective **AML/CFT/SCDD CP**:

- Policies, Procedures, and Internal Controls to Detect and Prevent **ML**/**TF** Activities, and Violations of U.S. Economic Sanctions Programs;
- The Designation of an **AML/CFT/SCDD** Compliance Officer;
- Ongoing Employee Training Program; and
- Independent Testing, Assurance Assessments, Auditing, etc., of the Company's **CP**.

DMMA's CP is also designed to combat systemic widespread **HRA** and environmental damage, associated with the extraction, transport or trade of metal/metal materials, and direct or indirect support to illegitimate non-state armed groups who:

- illegally control mine sites, or otherwise control**,** transportation routes, points where minerals are traded, and upstream actors in the supply chain;

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- and/or illegally tax or extort money or minerals at points of access to mine sites, along transportation routes or at points where minerals are traded;
- and/or illegally tax or extort intermediaries, export companies or international trade;
- and/or contribute to corruption **or** conflict; and other criminal activities such as theft, etc., through the purchase and sale of covered goods.

DMM's CP incorporates **OECD's 5SF** for responsible sourcing**,** and provisions for complying with the applicable requirements of Section 1502 of U.S. Dodd Frank Act that requires responsible minerals sourcing and companies to check their supply chains for tin, tungsten, tantalum, and gold (**3TG**), if they might originate in Congo or its neighbors and/or Conflict Affected and High-Risk Areas (**CAHRA**), Section 307 of the Tariff Act of 1930 to Prevent the illegal import into the U.S. "goods, wares, articles, and merchandise mined, produced, or manufactured wholly or in part" by forced labor and the Uyghur Forced Labor Prevention Act – Goods procured in the Xinjiang Uyghur Autonomous Region of China, the U.S. Trafficking Victims Protection Act, etc., and standards of **UN** Guiding Principles on Business and Human Rights**,** adopted by **LPPM:**

- Establish Strong Management Systems.
- Identify, Assess and Prioritize Risks.
- Manage Risks.
- Audit Control Points.
- Communicate and Report on Due Diligence.

Additionally, the program considers DOWA Environmental, Social and Corporate Governance (**ESG**) Factors, as applicable:

- Environmental Management – Including air, water, and land pollution, other environmental emergencies, and incident management plans.
- Water Management - Especially in areas of high-water scarcity and stress.
- Prohibition of unauthorized procurement from World Heritage sites or protected areas.
- Safe storage, handling, and disposal of hazardous chemicals.
- Management of Labor Issues – Including remuneration, working hours, collective bargaining, discrimination, diversity, conflict, and protection of workers.
- Community Engagement and Management Program – Including land acquisition and community resettlement, cultural heritage and indigenous peoples, closure plans and the protection of vulnerable populations.
- Managing the health and ethical conduct of the business and supporting the implementation of related initiatives, such as Extractive Industries Transparency Initiative (**EITI)**.

DMMA has established a management structure and framework to support **AML/CFT/SCDD** efforts, by establishing policies and procedures that define governance,

roles and responsibilities, internal audit requirements, effective communication, and senior management review as per the adopted policy.

DMMA's Board of Directors **(the Board)** established the Executive Compliance Committee **(ECC)** to ensure a culture of compliance and reciprocal communications between the Board and the compliance department. **DMMA's ECC** works as a team to ensure initial and ongoing **DD/EDD** is conducted with integrity and transparency. They meet monthly, and all meeting minutes are recorded. The **CCO** presents a report of recent compliance activities to the Board, who they meet with on a quarterly basis to review the effectiveness of the due diligence management system.

DMMA's President, with over 24 years of experience at **DMM** in mining development, purchasing, recycling and refining operations, is responsible for:

- Designation of an **AML/CFT/SCDD CCO** to administer the **CP**. Additionally, Federal and State Regulators expect the designated **CCO** to have the necessary authority and resources to effectively execute their duties.
- **CCO** supervision, training, and assignment of appropriate resources to support compliance efforts.
- Recommendations of revisions to the **CP/Manual** are reviewed by **ECC** and forwarded to the **Board** for approval.
- Ensuring **CCO** conducts an annual review of high-risk suppliers.
- Review and approve risk assessments/**SCDD** reports.

DMMA compliance operations are centralized under the leadership of a **CCO** (in place since January of 2023**)**, who has over 27 years of federal law enforcement service, 10 of them as a member of the Senior Executive Service. The **CCO** has accrued extensive experience incompliance and criminal investigations. Since retiring from a federal career, she has continued to work with regulators, industry partners, and non-governmental organizations in audit, compliance, and self-inspection. The **CCO** has served as compliance officer for a Money Services Business, a Humanitarian Emergency Influx Center for minor undocumented immigrants, as a Program Manager for a Department of Homeland Security contract (requiring federal/state/local compliance), and conducted audits and reviews of Use of Force Investigations for the state of Washington. The **CCO** is a member of the **ECC**, reports to the **DMMA** President and the **Board**, and is responsible for:

- Day-to-day compliance with the **BSA**, Section 1502 of U.S. Dodd Frank Act, U.S. - Section 307 of the Tariff Act of 1930, U.S. – Trafficking Victims Protection Act, and other related laws/policies/regulations, as appropriate.
- Establishment, execution, and maintenance of **SCDD** management system and framework;
- Conducting initial **CCS DD** and enhanced due diligence **(EDD)**, as appropriate;

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- Providing feedback and direction, based on **SCDD** results, to external/ internal stakeholders as appropriate;
- Monitoring and review of **SCDD** status;
- Creating and retaining records, in accordance with applicable requirements;
- Updating **CP** as necessary to reflect current requirements and related guidance issued by the Department of the Treasury and other regulators;
- Providing training and education commensurate with the risks imposed by the employees' duties and responsibilities;
- Providing for independent testing of the Program; and
- Documentation of **SCDD** results.

The manager of the **DMMA** Purchasing Department (since 2024) assists the **CCO** in managing **CCS** onboarding and transaction surveillance. He has worked for **DMM/DMMA** for over 9 years in the Production Management Department of Kosaka Smelting and Refining Co., Ltd., a subsidiary specializing in smelting and refining of copper, lead and precious metals, **DMM,** the Accounting, General Affairs and Purchasing for the Rare Metal Business Unit (Spent Auto Catalyst Recycling) and **DMMA** Purchasing Team, he is a member of the **ECC**, and reports to the **President/Board**. The Purchasing Manager travels extensively with the **CCO** to conduct **CCS** site visits, and is responsible for managing the process as follows:

- Training Purchasing Team on covered materials, processing, assay sampling and upstream internal/external stakeholders, initial/ongoing **CCS DD (CDD)** and **EDD**.
- Establishing applicant contacts and potential **CCS** relationships.
- Purchasing covered material, based on **CCS** identification program **(CIP)** and **KYC**.
- Thorough communication of **SCDD** results.
- **CCS** support services.
- **DMM** Portal - Verifying accuracy and completeness of documents and materials received.
- Transaction Monitoring and ongoing **CDD.**
- Preserving records of materials received.

DMMA cooperates fully and transparently with national and international government authorities, including providing access to information and records (adequately maintained and retained for at least five years or the minimum time stipulated by local regulatory requirements).

Step 2: Identify and Assess Risks in the Supply Chain

Compliance Statement with Requirement:

DMMA has established a multi-prong process to identify risks in the supply chain.

We have fully complied with Step 2: Identify and Assess Risks in the Supply Chain

Comments and Demonstration of Compliance

DMMA Identifies and Assesses Risks in the Supply Chain. While conducting a written Corporate Risk Assessment **(CRA)** is not a mandatory requirement for a **PMD**, it is considered a Best Practice. **DMMA**'s **CRA**, focused on its business lines, products, services, clients and geographical locations allow the Company to determine exposure to risks associated with **ML/TF/HRA,** etc. The **CRA** drives the development and adequacy of the **AML/CFT/SCDD CP**.

DMMA has implemented a written **CRA** process, that comprises a matrix with documented risk types and categories, inherent risk and description, mitigating controls or aggravating considerations, residual risk, and the risk score, to identify and manage Annex II and other risks in the supply chain. Multiple risk factors, including products, regulatory, geographic (that include **CAHRA), CCS**, and operational risks, and scores are applied to the inherent and residual risks. The **CRA** was last updated on August 27, 2025. **DMMA's** overall risk is declared as Low. It is the Company's policy to review the risk assessment every 12-18 months.

DMMA developed and implemented a **CCS** Risk Rating Methodology **(CRRM)** that measures product, source of supply, payment types, transaction volumes, geographical locations to include **CAHRA**, length of relationship, Suspicious Activity Reports (**SAR**) filed or confirmed negative news, and litigation history. Assessment of the points scored result in a **CRR** (high, moderate or low) drives the frequency of due diligence performed **on all of its CCSs** (12, 18, 24 months respectively), including initial and ongoing site visits. Based on the **CRR** criteria (see above eight (8) factors) approximately 22% of its **CCS** are considered high risk, and the majority of them are based in the U.S. Material changes may result in a **KYC** update, additional site visit or potential closure of the relationship. In **CY** 2025, DMMA visited potential **CCSs**, and **CCSs** (to include moderate and low risk **CCSs**) as scheduled based on their **CRR**.

DMMA has written **CCS** identification requirements in its policy and procedures. The Company has also implemented the **DMMA CIP** Initial & Ongoing **CDD** and **EDD** Procedures, **LBMA/LPPM** onboarding questionnaire, **CCS** risk assessment, and **CDD** File Checklists, ensuring all relevant data is collected before onboarding and approval.

Required CIP & CDD to verify a client's identity:

- Legal name of individual, corporation or entity.
- Organizational form.
- Type and purpose of business.
- Address of principal place of business, including State & Country.
- Phone numbers and email addresses.
- Copy of ID documents of all beneficial owners and authorized individuals.
- Information on Individual(s):

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- Sole Proprietor
- Beneficial Owners (25% or more)
- Controlling Individuals
- Authorized Individuals

Additional required documents:

- Articles of formation or business license.
- Federal Tax ID Number.
- Copies of government issued ID for each individual referenced.
- Proof of address for company or sole proprietor.
- Annual Certificate of Business Resale Tax for current year or documentation of good standing.
- Copy of any license or registration that applies to the line of business, such as Pawn Shop, Refiner, etc.

Bank Information for Transactions:

- Full name and address of beneficiary bank, routing number or SWIFT code, and Intermediary Bank.
- Complete name of the beneficiary company or individual and account number.

AML/CFT Certification includes:

- **CCS** Certification of Acknowledgment.
- Declaration of Origin of Funds and Goods.

Identification Verification

DMMA has implemented verification processes for all parties to the **CCS**, including beneficial owners. **DMMA** will not establish a commercial relationship with a potential **CCS** without identifying the **CCS's** identity with documentary and non-documentary evidence. The documentary verification process includes the use of the **LBMA/LPPM** Onboarding Questionnaire **(OBQ)**, and **OBQ** checklist **(OBCL)**, Site Visit Template **(SVT)**, and Site Visit Checklist **(SVCL)**. Screening for sanctions, politically exposed persons (**PEP**), negative news, and enforcement actions is performed during verification.

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KYC Workflow
DMMA has implemented a **KYC** workflow that includes:

- **OBQ**
- **OBCL**
- **CIP/KYC** documents requested.
- **CCS** Background Investigation & Sanctions Screening.
- Perform Site Visit and complete **SVT.**
- Assign preliminary **CRR.**
- Complete draft Raw Material Processing & Supply Agreement for signature.
- **CCS** Acknowledgement that **DMMA** seeks to comply with all laws concerning **HRA** firearms trafficking, **ML**, **TF,** or any other illegal activity, such as theft, etc**.,** under U.S. **or** foreign law and **CCS** commitment to same**.**
- **CCO** reviews file, determines if approved and assigns final **CRR.**
- **CCO**/designee and advises **CCS** of ongoing **CDD** requirements.
- **CCS** documentation is digitized, available electronically and in physical files.
- If account is denied, the **CCO/**designee will advise applicant and add to Denied Applicant Rejection List.

Step 3: Manage Risks

Compliance Statement with Requirement:

DMMA's CIP & **KYC** controls are commensurate with its risk profile. **DMMA** has a system of red flags and internal controls, including comprehensive **KYC** requirements, daily transaction monitoring, and ongoing **CDD** to ensure it captures any unusual activity.

Monitoring processes encompass its **CCSs** and the jurisdictions where they are transacting. Additionally, **DMMA** conducts **CCS** transporter **DD**. The pattern of transactional activity is monitored daily, and where transactions or patterns of activity are determined to be high risk, an investigation and additional **CDD/EDD** will be performed. Surveillance is performed by **DMMA** and other **DG/NC,** such as **NPGM USA** front-line personnel, who interface with **CCS**s/their representatives, their shipments, and payments. The **CCO/ECC**/designee reviews past transactions to detect unusual activity.

We have fully complied with Step 3: Manage Risks

Comments and Demonstration of Compliance

DMMA Manages Risks. It's **CIP** and **KYC** controls are commensurate with the size, complexity, and risk of the business. A risk-based approach to monitoring **CCS** activity, post onboarding is critical to the success of its **CP,** and as such, **DMMA**, will consider the following three components for surveillance of **CCS** activity:

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- Surveillance performed by **front line staff** (**FLS**) at **DMMA** who deal directly with **CCS/**their representatives, their shipments, and their payments.
- Surveillance (**SCDD**) conducted by **NPGM USA FLS** and other employees who have contact with the **CCS**/representative during shipment delivery.
- Surveillance performed by the **CCO/designee,** who performs routine **CCS** reviews of past transactions to detect unusual activity.

Surveillance by Front Line Staff

FLS deal directly with **CCSs**/their representatives. **DMMA** has developed a surveillance process that will adhere, at a minimum, to the following principles:

- The provision for **FLS** to receive regular training, commensurate with their position, to foster a high level of **AML/CFT/SCDD** awareness, including **AML/CFT/SCDD risks** associated with operations they are responsible for.
- How to interact with a **CCS** once unusual activity is detected/observed, including awareness of tipping off.
- A documented referral or escalation process on how to manage any unusual activities that are observed.

Initial, Ongoing Monitoring & CDD

- Based on the applicant/**CCS** risk assessment, **DMMA** establishes **CRR** and date next site visit is due (see Step 2). Additionally, **DMMA** engages in transaction monitoring and other ongoing **KYC** (continual education on **CCS** business, operations, types of sources of supply, etc.) through extensive communication efforts. If any red flags are identified, **EDD** is conducted to better assess or clarify the related issue. Based on this, the **CRR** could change or stay the same.

Enhanced Due Diligence

High-risk **CCSs** are visited more frequently, and additional questions regarding the source of materials and/or requests for visits with their higher-volume **CCSs** are requested. Shipments and changes are scrutinized rigorously, and personnel have more direct contact with the **CCS**.

EDD is also performed when unusual or heightened risk is triggered, such as a business model change, red flags noted during monitoring, or negative information surfaced. The **CCO** and **ECC** work closely together, discussing the strategy and potential actions. This collaboration may lead to the request for additional information from the **CCS** or an updated background investigation, including sanctions screening, site visit and modification of the **CCS** agreement.

Reviews that cannot be satisfactorily cleared, will be brought to the attention of **DMMA's** President for further evaluation.

- Collectively, with **DMMA's President/ECC**, based on the investigation, a determination will be made on whether the **CCS** relationship is to be terminated. If a **CCS** relationship is to be terminated, and the **CCS** has no open trades, the **CCS** will be placed in an inactive status and deemed deactivated on the **DMMA CCS** Deactivation/Reactivation List **(CDRL),** so that no further trades will be conducted.
- The **CCO** will make final determination on whether a voluntary **SAR** is to be filed.
- **EDD** is fully documented in an investigative report.

Monitoring

The **DMM Portal** and **DMM/DMMA's** automated system tracks all transactions and maintains **CCS** names, lot numbers, types of materials, weights, and assays. The **DMM** Portal is utilized by **CCSs** to enter advance notice of intent to deliver materials (quantity, type, weight, delivery method, authorized deliverers, etc.) and requires **CCS** to affirm the materials are not derived from any domestic/international criminal activity.

- The compliance team monitors new **CCS** transactions, **EDD**, and ongoing monitoring of existing **CCSs** to detect unusual activity based on assays, changes in volumes, changes in the way materials are delivered, changes in **CCS** customers, and jurisdictional changes. As payments are made at different stages of the assay, **DMMA** monitors the progression of those stages.

- The system has sort capabilities, allowing the compliance team to sort different elements to yield results. Targeted monitoring consists of analyzing monthly-quarterly-annual transactions and comparing them to prior monthly-quarterly-annual activity, reviewing new **CCS** transactions, final assays, and payouts during stages of the process, and daily reviewing assay results at **DMMA/NPGM USA**.

While monitoring, if anomalies are noted by the Compliance Department, or other **DG/NC,** it will conduct **CDD**/**EDD** as noted above.

DMMA Applicant Rejection List (DARL) and CDRL

- **DMMA** created the **DARL**, to document the rejection of an applicant (in 2025 no applicants were rejected) and **CDRL** to document changes in **CCS** status. The reasons for those actions (business or **AML/CFT/SCDD** reasons) are specifically indicated in the lists. In 2025, 17 **CCSs** were deactivated (one (1) no longer in business, fourteen (14) no business transaction conducted for over a year, one (1) unable to reach satisfactory terms, and one (1) failure to provide requested information), and three (3) were reactivated (previously deactivated due to no initial contract in place, contract in place but no materials received, no business transactions conducted for over one year).

Step 4: Audit Control Points

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Compliance Statement with Requirement:

DMMA's AML/CFT Program was adopted in November 2021. Policies and procedures were updated by the **CCO** and approved in July 2023, based on **CRA** and May 2022 independent audit best practice recommendations. **AML/CFT/SCDD CP** was again updated in September 2024 and August 2025, based on anticipated operational change, **CRAs** and Independent Testing and Assurance Assessment best practice recommendations. Numerous related Policy/Procedural Documents were created and updated in 2024 and 2025. In addition to the Policies & Procedures, **DMMA** has established a strong internal system of controls and transparency in its **SCDD**, including traceability and identification of other supply chain actors. Also, it works with **DG/NC** and other stakeholders in **SCDD internal review** and traceability.

We have fully complied with Step 4: Audit Control Points

Comments and Demonstration of Compliance

DMMA has established Audit Control Points. The **CCO** arranges for the **CRA**, independent review and assurance assessment, etc., of the **AML/CFT/SCDD** Program every 12 to 18 months to ensure the Program is adequate and addresses regulatory requirements. Based on the results of the **CRA** and internal/independent reviews/assessments, **CCO** makes recommended updates to **AML/CFT/SCDD** program (that includes updates to other policy/procedure documents). Updates/enhancements to the program are made every 12-18 months, or as necessary, reviewed by the **ECC** and forwarded to the **Board** for approval. **DMMA** collaborates with **DG/NC,** and other stakeholders, to evaluate downstream and upstream **SCDD** and Supply Chain Traceability.

DMMA has an automated transaction system, **SNIPE**, which has the capability to identify all customer transactions. In addition, each transaction resides on the **DMMA** cloud in the Purchase Value file where customer names, lot numbers, type of materials, weights and assays. Both systems have query/sorting capabilities. Additionally, the new **DMM CCS** Portal (along with **SNIPE** and the Purchase Value File form **DMMA's** Supply Chain Traceability System **(SCTS)** that captures date, time, type and weight of materials received, assigns unique reference numbers, and documents assays and payments) is utilized by **CCS** to enter advance notice of intent to deliver materials (quantity, type, weight, delivery method, authorized deliverers) and requires the **CCS** to affirm the materials are not derived from any domestic/international criminal activity.

DMMA has a "material lot receipt process", which requires the receipt of specific documents, and entering of transactional data take place before the material is processed. Traceability is supported from material receipt to smelting by **SCTS** and/or

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internal management system. To ensure traceability, **DMMA** records the following information for each transaction and keeps relevant paper document:

- Name of Supplier
- Type of Material
- Weight
- Assay Results
- Date of arrival at **DMMA/NPGM USA/NPGM**
- Payment Information – Amount/Date
- Relevant Documents Held in Paper Form
- Shipping Documents (Bill of Lading, Packing List, Customs Clearance)
- Receipt Report
- Sampling & Certificate of XRF/ICP Analysis Report

Step 5: Communicate and Report on Due Diligence

Compliance Statement with Requirement:

DMMA communicates on its **CP i**nternally with its employee**s, CCSs, DG/NC, and** externally with other stakeholders. DMMA publishes its commitment to compliance, responsible procurement and publishes its OECD 5 Step Framework Compliance Report and Statement (Responsible Sourcing Standard Utilized by International Associations/Markets/Organizations) on its website (**DMMA**'s Commitment to Compliance, **DMMA** Responsible **PGM** Procurement Policy, **DMMA** 2025 **OECD** Compliance Policy Statement), 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 CCO is responsible for implementing a program to train appropriate employees about **DMMA**'s **CP** and Applicable Laws. **DMMA's CCO**/qualified external instructor, will develop and deliver this training. Upon training completion, employees should be able to understand the Customer Identification, Initial, Ongoing/Enhanced **CDD** Procedures that allow **DMMA** to know their **CCS**. Also, employees should be able to recognize/identify red flags/signs that arise during the course of employees' duties. Employees are provided with the mechanisms to report red flags/suspicious activity indicators indirectly/directly through their chain of command, to **CCO** or anonymously.

We have fully complied with Step 5: Communicate and Report on Due Diligence

Comments and Demonstration of Compliance

DMMA Communicates and Reports on Due Diligence. In January 2025, **DMMA** published its CY 2024 **OECD** 5 Step Framework Compliance Report and Statement (Responsible Sourcing

Standard Utilized by International Associations/Markets/Organizations) on its website include (**DMMA**'s **OECD** Responsible Sourcing Compliance Report 2024, **DMMA** Compliance Policy Statement 2024), so that all internal and external stakeholder are aware of DMMA's commitment to compliance, whistleblowing policy and able to contact **DMMA** to make inquiries or report on matters related to ethics, integrity, etc.

In July 2025, **DMMA** published its Commitment to Compliance (see above):
DOWA Metals & Mining America is committed to upholding the highest standards of integrity and compliance. In line with our corporate philosophy, we continually invest in compliance, employee training, independent audits, and partner due diligence. We have policies and procedures in place to ensure the integrity of our supply chains and to guard against suppliers and others who do not meet our standards. We steadfastly comply with all legal requirements and standards in all jurisdictions in which we operate, and we cooperate with government authorities as a demonstration of our commitment to industry best practices.

In February of 2026, **DMMA** published its 2025 Responsible Procurement Policy, **OECD** 5 Step Framework Compliance Report and Statement (Responsible Sourcing Standard Utilized by International Associations/Markets/Organizations) on its website (**DMMA** Responsible **PGM** Procurement Policy, **DMMA** 2025 **OECD** Compliance Policy Statement), so that all internal and external stakeholder are aware of **DMMA's** commitment to compliance, whistleblowing policy and able to contact **DMMA** to make inquiries or report on matters related to ethics, integrity, etc.

Training

New employees chosen for training must undergo compliance training within six weeks of commencing employment and must thereafter attend at least one annual, in-house, **AML/CFT** refresher training by the **CCO**/qualified external instructor. Training may also include educational pamphlets, videos, internet courses, compliance memos, and in-person lectures. This training must include a review of the following:

- Current Applicable Laws.
- **DMMA's** current **AML/CFT/SCDD** and **KYC** procedures.
- Recognizing and identifying red flags and signs of **ML/TF/HRA** that arise during the course of employees' duties.
- Information on how to proceed once a risk is identified.
- Detailing employees' roles in **DMMA's** compliance efforts and how to perform those roles.
- The consequences (including civil and criminal penalties) for non-compliance with **AML/CFT/HRA l**aws and regulations.

DOWA Metals & Mining America, Inc.
109 Connecticut Dr
Burlington, NJ 08016
TEL: +1(609) 900-3692

The **CCO** will maintain a list of all employees who attended annual **AML/CFT/SCDD** training, as well as copies of the training agenda and any materials distributed. Such documentation will be maintained in accordance with **DMMA's** record retention policies and procedures.

Every **DMMA** employee has an independent obligation to conduct business activities in a manner that is consistent with the Core Values and applicable laws/regulations. **DMMA's** Code of Conduct and Employee Handbook provide additional information on business ethics, core values and employee responsibilities. To ensure employees have a consistent point of contact, to raise all ethics and compliance-related questions or concerns without fear of retaliation or other negative consequences, the **CCO**, serves as the principal point of contact for questions concerning **DMMA's CP**.

Additionally, every employee has an obligation to report suspicious activity to **DMMA** so therefore should make every effort to recall and document specific details discussed/observed. Suspicious activity may be reported directly to a supervisor, senior management, the **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).

DMMA engages in honest and open communication with their suppliers via phone, text, email, **DMM CCS** Portal, and in person. **DMMA** shares, with its suppliers, industry trends, and red flag industry/suspicious activity indicators with its **CCSs**. It also shares federal, state/local laws, regulations, policies/procedures, and business registration/licensing requirements in applicable jurisdictions.

DMMA's CP (independently audited every 12-18 months) was also assessed (period of scope - September 1, 2024 to August 31, 2025) by Arche Advisors (December 2025), which provided assurances of the company's **AML/CFT/SCDD Compliance Policy.**