As of the end of March 2026

Chugai Mining Co., Ltd.
Tokyo Plant, Precious Metal Division

Step 5 Report
(Responsible Minerals Initiative Diligence Report)

1. Corporate Profile

Chugai Mining Co., Ltd. (CID No.: CID000264)

Mochikoshi Mine Co., Ltd. was established in 1932 and merged with Yakumo Mine Co. and two other companies in 1936, changing its name to the current Chugai Mining Co. Ltd.

The Company owns one refining facility (Tokyo Plant), which is located at 2-12-16 Keihinjima, Ota-ku, Tokyo, Japan. Our smelting facilities produce gold products from gold raw materials.

2. RMAP Assessment Summary

The Tokyo plant underwent a Responsible Minerals Assurance Process (RAMP) assessment from August 22-25, 2023. The period covered by this evaluation is August 20, 2020 to August11, 2023. The assessment is valid for a period of three years. The assessment was conducted by SCS Global Services. The Company will continue to conduct audits in order to continue to obtain certification in the future. The next audit is scheduled to take place in August 2026.

3. Corporate Policy on Supply Chain

The Company has established a supply chain policy to avoid the use of conflict minerals that may directly or indirectly benefit or finance armed groups in high-risk and conflict areas, or result in other gross human rights violations.

This supply chain policy fully complies with the third edition of the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict and High-Risk Areas (OECD Guidance) and continues to comply with the Supplement on Gold in Annex III. This policy covers all risks identified in Annex II of the OECD Guidelines and applies worldwide

Should any of these risks be identified, the Company will do everything in our power to address them. The policy has been reviewed and approved by senior management who have committed to support its implementation. This policy is widely communicated to stakeholders (suppliers, customers, employees, etc.) and is also available on our website (https://www.chugaikogyo.co.jp/csr/materials/).

4. Corporate Management System

・Management Structure

In addition to ensuring compliance with our own supply chain policies, the Company has established internal due diligence procedures that include the following:

- Oversight of the design and implementation of due diligence programs and risk management practices is the responsibility of our Precious Metals Business Manager.
- To ensure each department properly fulfills its roles and responsibilities regarding the due diligence program's implementation and reporting of identified red flags and potential risks, the Company has appointed a Due Diligence Program Manager. This manager coordinates efforts among relevant

departments, including Sales, Manufacturing, and Administration.

- As required by the program, we conduct annual training on the due diligence management system for all relevant department key employees. If the program is updated, the Company will provide additional training.

・ Internal Management System

In October 2018, in line with the OECD Guidelines and RMAP, the Company developed and updated the content of its due diligence management system. Since October 2018, the Company have communicated this updated supply chain policy and sourcing requirements to all identified upstream suppliers.

The Company includes due diligence requirements as legally binding agreements in contracts with our direct suppliers.

The Company refers to RMI's complaint-handling mechanism to gather information on the handling of complaints from related parties.

・ Record Keeping System

The Company requires that all due diligence program records be kept in hard copy for at least 10 years. Starting in April 2019, these records must also be stored in a database using the new system.

5. Risk Identification

The Company has a robust process for identifying risks in our supply chain.

First, in accordance with the risks outlined in our Supply Chain Policy, the Company has established procedures for identifying conflict-affected and high-risk areas (CAHRAs). These procedures include the resources used, the criteria for defining "conflict-affected and high-risk areas," and how often we review our decisions. The Company established these procedures based on the U.S. Dodd-Frank Act

In determining CAHRA, the Company refers to the following resources:

1) The Heidelberg Conflict Index provides a conflict map showing the locations of armed conflicts in each fiscal year.

2) The Fragile State Index provides country-specific lists related to human rights violations and the rule of law.

3) The OECD Financial Action Task Force (FATF) list provides a high-risk list for money laundering and corruption.

4) The EU Conflict Minerals Regulation (CAHRAs list).

5) World Governance Indicators (WGI)

The Company uses its supply chain policy and information from external professional organizations to develop conditions and benchmark indicators for determining CAHRA.

Secondly, we have developed a know-your-supplier (KYS) system that includes information on the legal status and identity of suppliers, supplier mapping, and potential risks.

All of the smelters that the Company outsources to have already completed and returned the KYS forms. The manager in charge of our due diligence program collaborates with the sales department to review information from suppliers by cross-checking it against the UN sanctions list. If we find any inconsistencies, errors, or incomplete information in the KYS forms, we notify the relevant supplier and request that they resubmit the form with the necessary corrections.

If a red flag is identified, the Company will request that the supplier provide written clarification of the issue and implement corrective actions, if necessary. All business transactions with the supplier will be suspended at that time, and the Company will not resume business until it has verified, based on a report from the supplier, that the issue has been adequately addressed. During this reporting period, no red flags were identified in relation to the KYC forms submitted by suppliers.

Thirdly, the Company requires origin information for all material transactions and has established a system to identify the origin of each transaction, its transportation route, and the direct supplier's name and location based on this information. As the vast majority of the Company's transactions are with domestic suppliers, it generally complies with Japanese law and does not directly handle imported goods from overseas. The Company primarily deals in recycled materials and requires suppliers to agree to its supply chain policy by signing a confirmation form.

Fourthly, the Company reviews all collected information by cross-referencing it with CAHRAs, sanctions lists, local laws, and internal procurement requirements.

The Company identifies risks according to the four categories mentioned above.

During the reporting period (April 1, 2025, through March 31, 2026), the Company periodically reviewed the collected information by cross-referencing it with the items listed in Section 5, “Risk Identification.” No red flags were identified in any transactions or among any suppliers.

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