



GOLD FIELD REFINERY CO.,LTD

Gold Field Refinery Co., Ltd.

14 Soi Sukhaphiban 2 Soi 31, Khwang Dokmai, Pravat District Bangkok 10250

Tel : 02-035-38888 Fax : 02-035-3898

☒ Head office

☐ Branch office

HR.033/2569

GOLD SUPPLY CHAIN DUE DILIGENCE POLICY

Responsible Sourcing of Recycled Gold and Gold-Bearing Scrap

1. PURPOSE

Gold Field Refinery Co.,Ltd. is committed to responsible sourcing and the responsible processing and refining of recycled gold and gold-bearing scrap.

This Policy establishes the Company's commitment to identifying, assessing, preventing, and mitigating actual and potential risks associated with its recycled gold supply chain.

The Policy is guided by the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas and applicable requirements of the Responsible Minerals Initiative (RMI), including relevant requirements for gold refiners.

2. SCOPE

This Policy applies to the Company's management, employees, procurement personnel, receiving and weighing personnel, refining and production personnel, finance personnel, and other employees involved in the purchase, receipt, handling, processing, refining, and sale of recycled gold and gold-bearing scrap.

It applies to suppliers located in Thailand, including, as relevant to the Company's actual supply chain, gold traders, jewellery manufacturers, jewellery retailers, recycling businesses, collectors, and other suppliers of gold-bearing materials.

Where relevant information indicates that material may originate outside Thailand or has passed through other countries, the Company shall assess the associated origin, transit, and supply chain risks.

3. RESPONSIBLE SOURCING COMMITMENT

The Company commits to conducting its business in accordance with applicable laws and responsible business conduct principles.

The Company shall take appropriate steps to identify and address risks that its gold supply chain may be linked to:

Serious human rights abuses, including torture, cruel, inhuman or degrading treatment, forced labour, and the worst forms of child labour.

Direct or indirect support to non-state armed groups.

Illegal activities, fraud, bribery, corruption, money laundering, and terrorist financing.

Material misrepresentation of gold origin, ownership, composition, or transaction documentation.

Applicable sanctions violations and other serious legal or responsible sourcing concerns.



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Significant environmental or other adverse impacts identified as relevant to the Company's supply chain and applicable standards.

The Company shall not knowingly source gold in a manner that contributes to the serious adverse impacts described in this Policy.

4. SUPPLIER IDENTIFICATION AND VERIFICATION

The Company shall apply risk-based due diligence to suppliers before establishing business relationships and throughout the relationship, as appropriate.

The Company shall seek to obtain and verify information relevant to supplier identity, business legitimacy, beneficial ownership where applicable, the type and origin of gold-bearing material, and the nature of the transaction.

The level of verification shall be proportionate to the supplier, the material, transaction characteristics, and risks identified.

Politically Exposed Persons (PEPs) ; The Company shall apply risk-based procedures to identify and assess relationships with politically exposed persons (PEPs), their family members, and close associates, where relevant and in accordance with applicable laws.

Where a higher risk is identified, the Company shall conduct appropriate enhanced due diligence, obtain additional information regarding the nature and purpose of the business relationship, and seek senior management approval where appropriate.

The Company shall monitor relevant business relationships on an ongoing basis and maintain records of risk assessments and decisions.

5. ORIGIN INFORMATION AND TRACEABILITY

The Company shall maintain appropriate records to identify incoming recycled gold and gold-bearing scrap and to link received materials to relevant supplier and processing records.

The Company shall seek reasonably available information about the material's source, including whether it is recycled post-consumer material, manufacturing scrap, or another type of gold-bearing material.

Where the source or origin cannot be adequately established, the Company shall document the information gap, assess the associated risk, and determine whether additional verification or other risk management measures are required before proceeding.

6. RISK ASSESSMENT

The Company shall identify and assess supply chain risks using available supplier information, transaction documentation, origin information, screening results, and other credible information.

Risk indicators may include unclear or inconsistent origin information, unexplained changes in supplier details, unusual transaction or payment patterns, inadequate supporting documents, potential links to high-risk locations, or indications of illegal activity.



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A supplier's location in Thailand shall not, by itself, be treated as proof that the gold originated in Thailand or that the supply chain is free of risk.

7. RISK RESPONSE AND MITIGATION

Where a risk is identified, the Company shall evaluate its severity and likelihood and determine an appropriate response.

Measures may include requesting additional information, conducting enhanced due diligence, increasing monitoring, implementing corrective action plans, or suspending a transaction while material concerns are investigated.

Where there is a reasonable risk of serious abuses or direct or indirect support to non-state armed groups, the Company shall take action consistent with the OECD Guidance, including immediate suspension or discontinuation of engagement with the relevant upstream supplier where required by the applicable framework.

The Company shall disengage from a supplier or transaction where required by applicable law or where severe risks cannot be adequately prevented or mitigated, in accordance with the applicable framework.

Significant findings, decisions, and follow-up actions shall be documented.

8. ANTI-MONEY LAUNDERING, ANTI-BRIBERY AND LEGAL COMPLIANCE

The Company prohibits bribery, corruption, fraud, money laundering, terrorist financing, and other unlawful conduct.

The Company shall apply appropriate checks to supplier identity, transaction legitimacy, payment arrangements, and supporting documentation in accordance with applicable laws and internal procedures.

Concerns about suspicious transactions, inconsistent documents, unexplained third-party payments, or possible sanctions exposure shall be escalated to the designated responsible person.

9. ROLES AND RESPONSIBILITIES

Senior Management is responsible for approving this Policy, assigning appropriate responsibilities, and reviewing significant supply chain risks.

The designated responsible person or department shall coordinate due diligence, maintain relevant records, escalate significant concerns, and monitor the implementation of corrective actions.

Relevant employees shall follow applicable procedures, maintain accurate records, and promptly report suspected violations or material inconsistencies.

10. RECORD KEEPING

The Company shall maintain appropriate records of supplier identification, due diligence checks, material descriptions, available origin information, transaction documents, risk assessments, decisions, and corrective actions.



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Records shall be retained in accordance with applicable legal requirements and the Company's record retention procedures.

Access to records shall be controlled appropriately, while records shall be made available to authorized auditors or competent authorities when required.

11. GRIEVANCE AND REPORTING MECHANISM

The Company shall provide or designate an appropriate channel for employees, suppliers, and other relevant stakeholders to report suspected misconduct or responsible sourcing concerns.

Reports shall be reviewed appropriately and handled confidentially to the extent possible. Retaliation against individuals who raise concerns in good faith is prohibited.

Credible concerns shall be investigated and addressed through appropriate corrective actions.

12. TRAINING, MONITORING AND REVIEW

The Company shall provide appropriate guidance or training to relevant personnel on supplier due diligence, recycled gold traceability, risk indicators, record keeping, and escalation procedures.

The implementation and effectiveness of this Policy shall be reviewed periodically and when significant changes in business activities, suppliers, or supply chain risks occur.

13. APPROVAL AND COMMUNICATION

This Policy shall take effect upon approval by authorized management. It shall be communicated to relevant employees and, as appropriate, suppliers and business partners.

The Company shall review this Policy at least annually or when necessary to reflect changes in applicable laws, recognized guidance, and relevant RMI requirements.

As of January 10, 2026



GOLD FIELD REFINERY CO.,LTD.

(Mr. Trapong Tuenthamkaew)

Managing Director