DEMOCRATIC REPUBLIC OF THE CONGO

KISANGANI · TSHOPO

BOYOMA GOLD REFINERY

POLICY

Responsible Supply Chains of Minerals.

Responsible sourcing policy of Boyoma Gold Refinery SA, aligned with the OECD Due Diligence Guidance and its Supplement on Gold.

REFERENCE	VERSION	EFFECTIVE DATE	APPROVED BY
BGR-POL-RSC-001	1.0	November 2026	Board of Directors

Introduction

Boyoma Gold Refinery SA, as a gold dealer and refiner operating in the Democratic Republic of the Congo (DRC) — a conflict-affected and high-risk area (CAHRA) as defined by the OECD — recognises the significant risks associated with gold sourcing, including potential links to armed conflict, human rights abuses, illegal taxation, extortion, money laundering, bribery and support to non-state armed groups.

This Responsible Supply Chain Policy commits the Company to the responsible sourcing of gold in full alignment with the **OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas** (including the Supplement on Gold). We adopt the OECD five-step due diligence framework and incorporate the Model Supply Chain Policy (Annex II), to prevent our operations from contributing to conflict, serious abuses or financial crimes, while supporting legitimate artisanal and small-scale mining (ASM) in the DRC where feasible.

This policy applies to all gold sourcing, processing, trading and related activities. It is mandatory for all employees, suppliers, contractors and business partners.

Scope

This policy covers all raw gold (alluvial gold, doré bars, mined gold) supplied to our refinery in Kisangani, regardless of origin. Given our location in the DRC, enhanced scrutiny applies to all domestic and regional supply chains, including those from artisanal sites, cooperatives, traders, exporters and any upstream actors.

Boyoma Gold Refinery prioritises sourcing that promotes peace, development, the formalisation of ASM and economic opportunities for local communities, consistent with OECD recommendations for ASM in high-risk areas.

1 Serious abuses associated with extraction, transport or trade

Boyoma Gold Refinery will not tolerate, profit from, contribute to, assist with or facilitate:

- Torture, cruel, inhuman or degrading treatment.
- Forced or compulsory labour.
- The worst forms of child labour (ILO Convention No. 182).
- Other gross human rights violations, such as sexual violence.
- War crimes, crimes against humanity or genocide.

Response: immediate suspension or discontinuation of any supplier where a reasonable risk of such abuses is identified.

2 Direct or indirect support to non-state armed groups

Boyoma Gold Refinery will not provide any direct or indirect support (financial, logistical or material) to non-state armed groups or their affiliates who illegally control mine sites, transport routes, trade points or upstream actors, or who illegally tax or extort minerals, money or access.

Response: immediate suspension or discontinuation if a reasonable risk is identified.

3 Public or private security forces

Boyoma Gold Refinery will not support public or private security forces that illegally control sites or routes or engage in extortion. Where security is engaged, we align with the Voluntary Principles on Security and Human Rights, including vetting to avoid human rights abusers. We support transparent, proportionate payments to public security and seek to minimise impacts on vulnerable groups, including ASM miners.

Response: develop and implement risk mitigation plans; suspend if there is no improvement within six months.

4 Bribery and fraudulent misrepresentation

We prohibit offering, promising, giving or demanding bribes, and resist any solicitation to conceal the origin of gold or misrepresent taxes, fees and royalties.

5 Money laundering

We support efforts to eliminate money laundering linked to illegal taxation or extortion in the mineral trade, in line with our AML/CFT Policy.

6 Payment of taxes, fees and royalties

Boyoma Gold Refinery ensures that all payments to governments (taxes, fees and royalties) related to sourced gold are made transparently and in compliance with DRC law and, where applicable, the principles of the Extractive Industries Transparency Initiative (EITI).

Risk management for bribery, money laundering and payments: engage suppliers and stakeholders on mitigation; suspend if there is no improvement within six months.

Due diligence framework — OECD five-step process

Step 1 · Establish strong company management systems

- Adopt and communicate this policy internally and to suppliers.
- Integrate it into supplier contracts and KYC forms.
- Maintain internal controls, chain-of-custody records and traceability systems (unique batch IDs, documentation from mine to comptoir and refinery).
- Appoint a senior compliance officer responsible for due diligence.
- Train staff on OECD standards and red flags.

Step 2 · Identify and assess risks in the supply chain

- Map supply chains: mine of origin, transport routes, intermediaries, exporters.
- Conduct enhanced due diligence for all DRC-sourced gold, including on-site visits where feasible, supplier questionnaires and verification of documents (licences, tax receipts).
- Screen against sanctions lists and identify red flags (CAHRA origin, armed group presence, unusual volumes or purity, rapid turnover).
- Use upstream assurance mechanisms or equivalent tools for traceability where applicable.

Step 3 · Design and implement risk response strategies

- Categorise risks (low, medium, high) and develop mitigation plans.
- For high-risk suppliers, engage in measurable improvements such as formalisation support and security training.
- Suspend high-risk suppliers if risks cannot be mitigated, with potential re-engagement after improvements.
- Prioritise ASM formalisation and community development.

Step 4 · Carry out independent third-party audits

- Engage qualified independent auditors to verify due diligence practices annually, aligned with OECD Step 4 and relevant standards such as the LBMA Responsible Gold Guidance where pursued.
- Make audit findings available to relevant stakeholders.

Step 5 · Report on supply chain due diligence

- Publish annual reports on due diligence efforts, identified risks, mitigation actions and outcomes.
- Disclose high-risk suppliers or locations as required by applicable standards.

Supplier expectations

All suppliers bringing raw gold must:

- Complete our OECD-aligned due diligence questionnaire in full and provide verifiable evidence.
- Adopt a policy consistent with this one and with the OECD Guidance.
- Maintain their own due diligence and provide traceability information.
- Allow on-site assessments and audits, and cooperate in risk mitigation.
- Report concerns through our grievance mechanism.

Non-compliance may result in suspension or termination.

Grievance mechanism

Boyoma Gold Refinery maintains a confidential and accessible mechanism for stakeholders — workers, communities and suppliers — to report concerns about sourcing practices, abuses or policy violations: info@boyomagold.com, +243 824 304 972, or the “Grievance” form on www.boyomagold.com. Reports are investigated promptly, with corrective action and feedback.

Continuous improvement

This policy is reviewed annually or upon material changes, such as new regulations or risk developments. We commit to ongoing training, stakeholder engagement and collaboration with initiatives supporting responsible ASM in the DRC.

CONTACT

Compliance Officer · Boyoma Gold Refinery SA
13, avenue Mabe Sabiti, Quartier Tshatshi, Commune de Makiso, Kisangani, Tshopo, DRC
info@boyomagold.com · +243 824 304 972

APPROVED BY

Board of Directors, Boyoma Gold Refinery SA