

Fremada Gold

Annual Sustainability Statement

2025

As a proud member of the Responsible Jewellery Council (RJC), Fremada Gold is committed to the continuous implementation of the RJC Code of Practices (COP). In line with this commitment, we have established a comprehensive set of policies, procedures, and due diligence systems designed to uphold the COP's requirements across our operations and supply chain.

We believe that strong, transparent relationships with our suppliers and business partners are key to promoting responsible business conduct. Our approach is grounded in collaboration, with a focus on preventing, mitigating, and addressing adverse impacts—particularly those related to human rights, including child labor and forced labor—throughout our supply chain.

Our due diligence activities are informed by the UN Guiding Principles on Business and Human Rights and the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas. Key elements of our approach include:

- **Responsible Business Practices Policy:** We have adopted and published a Responsible Business Practices Policy, which includes our supply chain and human rights commitments. This policy is publicly available on our company website and serves as a guiding framework for our business conduct.
- **Supply Chain Mapping and Information Management:** We have implemented internal systems and controls to gather and document information on the geographical origin of the jewelry materials we source. This enables greater transparency and traceability in our supply chain.
- **Risk Identification and Assessment:** Our systems are designed to identify both actual and potential risks related to human rights and labor practices among our direct suppliers. We conduct ongoing assessments to ensure emerging risks are captured and addressed.
- **Assessment of Conflict-Affected and High-Risk Areas (CAHRAs):** We apply a structured methodology to identify CAHRAs and other OECD-designated 'red flags' in our upstream supply chain. This is a critical component of our risk-based approach to responsible sourcing.
- **Risk Mitigation and Response:** Where risks are identified, we implement targeted mitigation measures that are proportionate and appropriate to the nature and severity of the issue. These controls support informed decision-making and responsible supplier engagement.

Through these measures, we aim to uphold the highest standards of integrity and accountability, while supporting broader efforts to build a more responsible and resilient jewelry supply chain.

Updated results from our 2025 Supply Chain Risk Assessment

As part of our commitment to responsible sourcing and respect for human rights, we assess all of our direct suppliers at least annually through our supplier due diligence and risk assessment processes. To date, the results of our 2025 assessment have not identified any significant human rights or labor practice risks associated with our direct suppliers.

Fremada Gold sources precious metal products from a number of suppliers based in Turkey—a country identified as high-risk under our internal risk assessment methodology and aligned with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (OECD Guidance). In accordance with Step 2 of the OECD's Five-Step Framework, we have conducted enhanced due diligence on these suppliers.

As a result of this due diligence, we have confirmed that the precious metals supplied to Fremada Gold originate from refiners that have been independently audited against internationally recognised standards aligned with the OECD Guidance. These standards include rigorous assessments of the refiners' raw material sourcing and due diligence practices.

While we are in the process of verifying information from a small number of suppliers, we are committed to taking appropriate action should any supplier be unable to provide sufficient and credible information regarding the origin of the materials they supply. Where necessary, this may include terminating the business relationship with non-compliant suppliers.

We remain dedicated to strengthening our supply chain due diligence systems and continuing to align our practices with RJC standards to ensure the integrity and sustainability of our sourcing activities.