

**Abington Reldan Metals, LLC 2020 Public Due
Diligence Report**

1. Company Information

Abington Reldan Metals, LLC (ARM) operates a precious metals refining facility covered under CID number CID002708, in Falls Township, Bucks County, Pennsylvania. This report covers our due diligence operations from October 1, 2019 to September 30, 2020 with improvements to our due diligence management system made and implemented through July 31, 2021.

For over 40 years ARM has been a leader in global precious metals refining that turns complex waste streams and end-of-life material into reusable resources. ARM's core mission is to develop clean metals refining technologies and solutions that simultaneously optimizes the waste recovery of precious metals while doing its part to de-carbonize the supply chains of revolutionary new products.

Global manufacturers increasingly recognize that waste streams created in their manufacturing processes or the retirement of products they produce present ever-evolving opportunities and risks related to their own participation in the worldwide goal of net zero emissions. They often lack the technical capacity and visibility to effectively manage their downstream waste and rely on ARM's consultative approach, metals expertise, waste management knowledge, track-and-trace capability, and global refining capacity to quickly scale innovative solutions. By partnering with Reldan, OEMs optimize manufacturing use of precious metals and gain assurance or "peace of mind" that their end-of-life products are net positive contributors to de-carbonization.

2. RMAP Assessment Summary

Abington Reldan Metals underwent a RMAP assessment on November 17-19, 2020. The assessment is valid for one year. The assessment period was from October 1, 2019 to September 30, 2020. The assessment was conducted by SCS Global services an RMI appointed Sourcing Audit Firm.

The assessment summary report is public and available on the RMI Homepage under our CID number in the conformant Gold smelters list. <http://www.responsiblemineralsinitiative.org/gold-refiners-list/>

3. Company Supply Chain Policy

Abington Reldan Metals is strongly committed to ensuring that any metals sourced in our supply chain for manufacturing products or materials received by ARM is done so in a manner that is ethical and humane. As part of our supply chain due diligence, as well as our intention in establishing long-term relationships with our immediate suppliers, ARM shall be mindful and assess the severity as necessary of risks as recommended in the OECD Guidance Annex Model and in accordance with the U.N. resolutions and Section 1502 of the Dodd Frank Act.

Abington Reldan Metals, LLC (ARM)'s is committed against includes but is not limited to:

- Combatting serious human rights abuses associated with the extraction, transportation or commercialization of minerals;
- Avoiding contributing to any conflict;
- Complying with anti-money laundering (AML) standards;

- Complying with standards on combatting the financing of terrorism (CFT);
- Excluding any direct or indirect support to state and non-state armed groups and/or illegally acting public or private security forces;
- Ensuring the payment of taxes, fees, and royalties due to governments;
- Avoiding bribery and fraudulent misrepresentation of the origin of precious metals;

The Policy is public and available on the RMI Homepage under our CID number in the conformant Gold smelters list. <http://www.responsiblemineralsinitiative.org/gold-refiners-list/>

4. Company Management Systems

Management Structure

The company follows through on its commitments in the supply chain policy and has developed an internal procedure for due diligence with the following aspects:

- The company's VP of Operation, AML Chief Compliance Officer, is responsible to oversee the due diligence program and risk management design and implementation. As mentioned in our Scrap Supplier Validation Procedure (KYC Procedure) the VP of Operation will be informed if any supply chain risks are identified or if any are reported through the ARM's grievance mechanism.
- The company has assigned a due diligence program manager and due diligence team to coordinate the work of relevant departments to ensure each department follows up on their roles and responsibilities to implement the due diligence program and report any red flags and potential risks identified and seek out opportunities to improve the program.

Key members of the ARM due diligence team includes:

- Account Inventory Clerk, who is responsible for the onboarding and vetting of new suppliers.
- All Salespersons, who work on sourcing scrap feedstock as well as addressing the needs of the customers.
- All Customer Service Representatives, who assist with the administrative concerns of the customers.
- All members of our Accounting team, ing, who coordinate and oversee all incoming and outgoing transactions relating to money and precious metal movement
- All Logistics Staff, who coordinate and oversee the transportation of goods to and from the organization and customer.
- EHS Manager, who oversees the management system and implementation of compliance programs.
- All team members directly or indirectly involved in the Compliance process regarding onboarding as well as shipment arrangements
- Warehouse Manager, who oversees the receipt and handling of all materials into and out of the facility

The company conducts due diligence management system training once a year for all employees and a more detailed training for those Key members of the ARM due diligence team was completed by June 1, 2021.

In 2021, ARM made the following improvements Supplier Due Diligence Process:

- Aligned Supply Chain Due Diligence Policy with OECD Annex II
- Strengthen CAHRA Process with a Risk Assessment Matrix and Trade Wizard Review
- Updated Periodic KYC Review Process based on associated supplier associated risk

Internal Systems of Control

The company has established/updated its due diligence management system to be aligned with the OECD Guidance and RMAP.

For upstream verification, ARM has implemented a Know Your Customer process (KYC) that has been documented in the ARM-100-EWI-011 Scrap Supplier Validation Procedure in which the company evaluates and approve its suppliers.

Any potential suppliers will be required to complete the KYC process before they can become an approved supplier. This evaluation is conducted during the onboarding process and depending on the risk profile for the supplier, revaluations will be performed with the following frequency: annual, 3 year, 5 year. This evaluation is performed for both Anti-Money Laundering and Patriot Act requirements and includes completing KYC questionnaire/checklist, beneficiary review actions sanction lists, to identify the type of business relationship and the legality of the business operations, including business license and structure. It also requires an understanding and agreement to our Supply Chain Due Diligence Policy.

The company has a documented procedure, *ARM-100-EWI-011 Scrap Supplier Validation Procedure*, which describes the process to Identify possible risks outlined in the OECD Annex II risks, that could be associated with Conflict affected, and High-Risk areas (CAHRAS) in our supply chain, related to our Gold sourcing. This procedure includes knowing and understanding the materials origins and transportation routes.

The company communicates the updated supply chain policy and sourcing requirements to all identified upstream suppliers via our supplies code of conduct as well as through our Terms and Conditions stated on our purchase orders. In this way the company has incorporated due diligence requirements into legally binding agreements with direct suppliers.

Should any party wish to voice a concern regarding the circumstances of mineral extraction, trade, handling or export they can report it directly to Abington Reldan Metals at the following email compliance@armetals.com or via the RMI Grievance mechanism procedure and reporting function @ <http://www.responsiblemineralsinitiative.org/minerals-due-diligence-container/risk-management/grievance-mechanism/>

For any grievance that is brought to the attention of ARM, ARM will utilize *ARM-100-SOP-011_16 Non-Conformance and Corrective and Preventive Action* to formally track and respond to any grievances. All grievances will be brought to the attention of Senior Management.

The company will conduct an annual review of the effectiveness of the due diligence management system. Should any part of the system be deemed ineffective corrective actions will be taken immediately by the program manager and reported to the VP of operations to ensure the system remains effective.

After all the upstream due diligence is conducted, once supplier material is sent to ARM it received and processed according to our receiving procedure, *ARM-530-EWI-001 Material Receiving Inspection*. All material that is received is inspected, any required seals are cut by the Receiving Supervisor, receiving material handler, or AR Metals designee. The witness will initial and complete the Receiving Report Checklist noting inspection of contents, overages/shorts, and assignment of Lot/Receiving Number.

If any anomalies are detected regarding the seal or container, the container CAN NOT be opened. The Receiving Supervisor should immediately contact the Logistics Manager to investigate the anomaly and resolve the situation.

IF the material is approved to be received, the material is weighed, photos are taken, and a assigned a lot number using of Enterprise Resource Planning (ERP) software for proper accounting of all material onsite.

Record Keeping System

All material receipts are logged into our ERP system. As part of our annual conformant suppliers audit these transactions are audited by a third party and an inventory balance analysis is completed to ensure all inventory is accounted for.

The company requires that all records relating to the due diligence program are maintained at least for five years and that they be properly used and safely stored.

5. Risk Identification and Mitigation

ARM has established procedures that *align with the OECD Due Diligence for Responsible Supply Chains, Annex II for the* purpose of identifying and mitigating actual risks that it has identified in its supply chain. If actual risks are identified in the supply chain, ARM will engage with appropriate stakeholders, local governments, and international organizations to attempt to mitigate the risks. These risks will be reported to the Chief Compliance Officer, who will then work to create a plan to mitigate the identified risks. The plan will include timetables, measurable steps and goals to be agreed upon with stakeholders to improve and reasonably eliminate the identified risk(s). Whenever ARM feels that they will have a positive social impact on stakeholders in the supply chain by remaining engaged with a supplier, ARM will make sincere attempts to do so. When all efforts to mitigate *risks are exhausted, or if ARM cannot adequately engage stakeholders to participate in risk mitigation, ARM will disengage from a supplier. ARM will segregate materials from that supplier and hold them from* processing until actual risks are mitigated when appropriate.

No risks of harm were identified in this reporting period.