

## Responsible Precious Metals Management Policy

Established on February 10, 2017

Revised on April 23, 2025

As one of LBMA and LPPM accredited refiner, Solar Applied Materials Technology Corporation (SOLAR) is aware of the threat financing and Environment, Social, Governance (ESG) risks associated with extracting, trading, handling, exporting, and refining precious metals on a global scale. Thus, SOLAR has adopted a control system that follows the London Bullion Market Association (LBMA) Guidance for gold and silver, the London Platinum and Palladium Market (LPPM) Guidance for Platinum and Palladium, and the Responsible Mineral Initiative (RMI) Responsible Minerals Assurance Process (RAMP) for procurement of precious metals and undergoes regular audits by third-party bodies.

SOLAR hereby sets out its raw materials responsible sourcing policies and will promote responsible precious metals management in line with the following measures:

### 1. Scope

This policy applies to Gold, Silver and Platinum (Precious Metals).

### 2. Establishment of management system

Due diligence committee has been set up to promote responsible precious metals management. The members of the due diligence committee are expected to actively participate in the due diligence process following the responsible precious metals control system and complies with relevant policies. The Compliance Officer is also a member of the due diligence committee and performs due diligence review of the precious metals supply chain follows the five steps framework for risk based due diligence of the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (CAHRAs). Regular committee meeting is held each year to report to the Chairman, the Director of the Board, that outlines the procedures followed, the inquiries undertaken and a conclusion.

### 3. Determination of high-risk supply chain

We deem the Precious metals involving the following risks to be high-risk:

- ✓ systematic or widespread human rights abuses associated with the extraction, transport or trade of Precious metals;
- ✓ direct or indirect support to illegitimate non-state armed groups, or public or private security forces;
- ✓ bribery and fraudulent misrepresentation of the origin of Precious metals;
- ✓ non-compliance with taxes, fees and royalties due to governments related to mineral extraction, trade and export from Conflict-Affected and High-Risk Areas (CAHRAs);
- ✓ money laundering or terrorism financing;
- ✓ contribution to conflict; or
- ✓ inadequate response to Environmental, Social, and Governance (ESG) risk.

- ✓ In the case where zero-tolerance supply chain issues defined by LBMA RGG or LPPM RPG.

#### **4. Identification and assessment of risks in the precious metals supply chain**

Before entering into a business relationship, we conduct due diligence to all suppliers and materials to identify and assess risks in the precious metals supply chain. If any of the risks stated above exist, then that Counterparty must be identified as a High-Risk Counterparty and we would not conduct business with those Precious Metals. If the transaction is determined as high-risk, we will mitigate the risk. If the risk is not mitigated, we will terminate the transaction.

#### **5. Monitoring and recording of transactions**

We check actual goods of precious metals to ensure their consistency with the information acquired by due diligence. Adequately store and maintain all records and documentation relating to the precious metals supply chain in order to demonstrate that appropriate and on-going due diligence has been followed for predetermined period.

#### **6. Education and training**

We provide annual training and irregular refresher trainings to all employees engaged in responsible precious metals management.

#### **7. Third-party audit**

We will periodically carry out an independent third-party audit for our responsible precious metals management system and the state of it.

Chii-Feng Huang

Chairman  
Solar Applied Materials Technology Corporation