

TCA Compliance Report 2024

Table 1: Refiner's details	
Refiner's name	TCA Trattamenti Ceneri Auroargentifere S.p.A.
Entities and locations	Headquarters: Zona industriale Castelluccio, 11 52010 Capolona (AR), Italy Secondary Plant: Via Tagliamento 12, Altavilla Vicentina (VI) Secondary Plant: Via Gramsci 10/B, Sale (AL)
Reporting year-end	31.12.2024
Date of Report	28.03.2025
Senior Management responsible for this report	Mr. Tommaso Chiarini
Compliance Officer	Mr. Andrea Susi
<p>History</p> <p>TCA came into being in Tuscany, in the pulsating heart of the Italian gold-silver district. Founded in 1977 in Arezzo, where it is headquartered, TCA has two other branches in Vicenza and Valenza, for a total of 149 employees at 31st December 2024 and three plants. Its partners lend to TCA their extensive experience and in-depth knowledge of the sector acquired in the Tuscan company, which has become a global leader in the jewelry industry. From its initial specialization in the treatment of ashes containing gold and silver, TCA has grown to include platinum, palladium and rhodium recovery. Having always aimed at achieving the highest quality standards, TCA has successfully undertaken a strong internationalization strategy and has established new, major business relations with top world players in refining and trading precious metals. Since November 2016, TCA is a Commercial Member of the Responsible Jewelry Council (RJC) and on February 2017 TCA got the RJC Accreditation as for CoP (Code of Practice) and CoC (Chain of Custody) rules. On 3rd of October 2017, TCA got the Accreditation as LBMA Good Delivery Refiner for the Silver. On 12th of July 2022, TCA got the Accreditation as LPPM Good Delivery Refiner for Platinum & Palladium. The latest RJC, CoC and CoP Audit for Gold, Silver, Platinum & Palladium has been carried out on October 2024. On January 2023, TCA has acquired the Accreditation as LPPM Good Delivery Refiner for Platinum & Palladium Sponge and on August 2024, TCA has been acquired the Accreditation as LPPM Good Delivery Refiner for Rhodium Sponge.</p>	



Methodological Note

TCA receives lots of high, medium and low grade materials containing Precious Metals and, after the refining process, acquires the pure Gold & Silver from its national and international Suppliers. TCA deals also with the primary worldwide banks, by un-allocated precious metal accounts. As a consequence, TCA purchases non-physical precious metals from its financial counterparts.

TCA EVALUATION

Table 2: Summary of activities undertaken to demonstrate compliance

Step 1: COMPANY MANAGEMENT SYSTEMS

Compliance Statement with Requirement:

TCA has fully complied with Step 1: Establish Strong responsible Sourcing Management Systems

1.1 Has the Refiner adopted a supply chain policy regarding due diligence for supply chains of gold and/or silver?

TCA has adopted a company-wide policy and procedures regarding due diligence for the supply chain of Gold & Silver.

Comments and Demonstration of Compliance:

TCA is located in Arezzo, where it is headquartered, and has two other branches in Vicenza and Valenza.

In 2012 TCA started formalizing the supply chain policy for responsible sourced metals (including gold and silver) which is based on the Code of Conduct and ethics and compliance policy.

TCA keeps on the enforcement of the supply chain policy for Precious Metals, which is consistent with the model set out in the Annex II of the OECD due diligence guidance. This sets out the responsibility for conducting risk based due diligence, screening and monitoring of all transactions and governance structures in place. The latest policy on responsibly-sourced metals can be found on TCA's website.

During 2019 the policy was updated in order to integrate all the precious metals processes by TCA such as Platinum & Palladium.

The policy has then been updated during 2022, and reviewed in the first months of 2023, so to include ESG principles in the Due Diligence process. The supply chain policy is approved by the Board of committee and publicly available on the website ([Responsible Metals | TCA \(www.tcaspa.com\)](https://www.tcaspa.com))

Further information and details of how TCA's systems, procedures, processes and controls have been implemented to align to the specific requirements in the LBMA Responsible Gold Guidance and LBMA Responsible Silver Guidance have been set out in their responsible gold and silver policy which is available on their company website.

TCA has issued a Management Review, as for the Responsible Guidance Management System, which provide full explanations and clarifications on the following matters: 1) Information relating to the Gold & Silver Supply Chain and Platinum & Palladium Supply Chain; 2) New Contractual Relationships of 2024; 3) Update on the Responsible Precious Metals Policy; 4) Rh Sponge accreditation at LPPM; 5) Examination and in-depth analysis of the CheckLists aimed at the Assessment of Suppliers; 6) Activation and use of the specific IT platform relating to the Due Diligence



& Risk Assessment Procedure; 7) Country Risk Assessment: activation of a relationship with LSEG for the acquisition of information on Country Risk; 8) Training activities carried out during the 2024 financial year: in particular, planning and launch of training in the field of Anti-Money Laundering and Risk Assessment Policy.

The Supply Chain Policy is reviewed annually by the Compliance Officer as part of the continuous improvement process of the Responsible Metals Management System. Each year, the updated version of the policy is formally presented during a Board meeting, attended by the General Manager and designated representatives of the Board of Directors. The policy is then reviewed, discussed, and formally approved during the meeting. The final version is signed by the General Manager, confirming top-level commitment and accountability. This process ensures that the policy remains up to date with regulatory developments, internal changes, and requirements from the LBMA and the OECD Due Diligence Guidance.

1.2. Has the refiner set up an internal management structure to support supply chain due diligence?

TCA has set up an internal management structure to support supply chain due diligence: the Compliance Officer in charge directly reports to the Board and to the CEO.

The management and activities related to Due Diligence are carried out by the following entities:

- Team Compliance: The team is led by the compliance officer with 10+ years of experience. The team deals with the opening of the case, collection, and analysis of the documentation provided by commercial counterparts, compilation, and insertion of compliance investigation – Responsible for the correct, comprehensive, and complete collection of documentation;
- Commercial Team: The team is led by the CCO with 10+ years of experience and deals with compilation and management of commercial investigation – Responsible for the correct business configuration of the commercial counterpart;
- Compliance Officer: Review of Risk Assessment, final judgment (approval/rejection of practices) – Responsible for the correct configuration of Risk related to the opening and/or conduct of the commercial relationship.

The outcomes of the compliance team meetings are communicated at least annually or as needed to the governing body (Board of Directors), which ultimately has the authority to ratify, supplement, or modify the general guidelines of the TCA Due Diligence Policy.

The Compliance Officer is tasked with periodically acting as a spokesperson to the Board of Directors through meetings. Additionally, the CO reports to the Board of Directors whenever an exceptional situation occurs.

The board of directors includes two members (CFO and CCO) of the team compliance that, due to their role, have a comprehensive understanding and experience regarding responsible sourcing activities.

The analysis activities carried out by the compliance analyst are compliant with the policy and procedures regarding due diligence for the supply chain of Gold & Silver. TCA implemented a Manual of Responsible Gold & Silver Management System.

Regular training on the subject of supply chain due diligence is carried out by the member of the compliance office that handles Due Diligence operations. Moreover, during 2024 the main employees that work on the DD matters have undertaken specific supply chain due diligence training. The training was followed by six employees in the compliance office and was focused on the DD procedures for the activation of new and pre-existing counterparties; on the new KYC questionnaire and related responses received; especially on the new ESG topics.

Additionally, other training related to the responsible supply chain management has been carried out by all the employees (e.g.: anticorruption, AML).

TCA relies solely on payments through the official banking channels, with extremely rare exceptions for small payments below 300€, always checked and approved by the compliance officer.



The collected documents are stored by TCA for a period of 5 years from receipt and are gradually updated in case of maintaining the relationship with the counterpart.

Comments and Demonstration of Compliance:

An internal management system has been set up to define the governance, roles and responsibilities, internal audit, communication and Board review as per the adopted policy. The compliance officers have been assigned to design, supervise and review the overall process, and have a direct line of reporting to the Board and the CEO.

The due diligence process in place includes the documentation and information collection in order to ensure suppliers compliance with the local environmental regulation and all the legal provisions regarding protection of the environment and sustainable development.

TCA has defined its Due Diligence process on the information acquired by primary worldwide business information providers (such as D&B, CERVED, World-Check by Thomson Reuters, and recently by List of Reference issued by the Bank of Italy) which helps and supports the activities of collection of information that could affect the new counterpart and/or the regular transactions carried out.

TCA continuously conducts a monitoring on the counterparts collecting any kind of news which could be useful in order to re-assess the global/potential risk in the supply chain.

Furthermore, recently, the Company has led training session for the introduction of a new business information, concerning: I) Media Check (which means every message, information or communication caught in the worldwide media system) and II) Passport Check (a verification on the Passport number of the individuals representing the Company TCA is dealing with). As TCA intends to increase its quality and reliability standards on the information acquired during the Due Diligence process, this new sources of data will be added to the set of information already acquired.

In 2020 TCA has started to enforce its supply chain due diligence policy and system, by integrating the assessment of the suppliers with a deeper evaluation of environmental and social issues (ESG questionnaire). During 2024 the refiner has sent to the counterparties either a specific questionnaire (including all the requests in LBMA KYC, as well as requests regarding specific ESG topics) or the new LBMA KYC, to integrate and increase the information needed to carry out a complete and precise Supplier Risk Assessment.

The risk assessment process and the whole system of procedures and policies is being revised downstream of the new Responsible Gold Guidance version 9 in order to fully integrate the ESG part of the questionnaire in the Risk Assessment and to be compliant with the new guidance. Following the improvement on the Risk assessment (adoption of a platform for Risk Assessment in the IT system AS400) TCA acknowledge the need to further enhance the formal documentation of the assessment of the counterparties' risk based on the activities already carried out as described in Step 2.1.

In FY2024, no material violations of the internal due diligence process were identified or escalated. All due diligence procedures were followed in accordance with the established policy and were regularly monitored by the Compliance Officer and the Compliance Team.

Minor inconsistencies or missing documentation observed during onboarding or periodic reviews were addressed promptly through follow-up with the counterparties, and did not require escalation to the Board. The Compliance Officer ensured full traceability of corrective actions and documented all reviews within the internal due diligence system.

1.3 Has the Refiner established a traceability system over gold and/or silver supply chains, including chain of custody mapping and identification of supply chain actors?

Comments and Demonstration of Compliance:

TCA has a robust 'lot' receipts process, and specific documents must be received and transactional details entered before TCA processes any gold-bearing and silver-bearing and other conflict materials. Each lot received is accurately registered in the transactional system and ensures complete traceability within the production streams. Specific



controls regarding received materials (evaluation of quality through laboratory analysis, transportation documents, weight) are carried out before processing incoming material as outlined in the internal guidelines. Regular training of the employees ensures that the guidelines are followed through; in case of nonconformance, it will be immediately reported directly to the compliance officer and senior management. During the reporting period no such escalation was necessary.

Our due diligence process initially involves the compliance office sending an email to the counterparty with a request for documents and forms to be filled. The collected documents are entered into our due diligence system; the practice is evaluated and approved or rejected by the Compliance Officer. The counterparty is then informed of the outcome by email.

The list of required documents includes:

LBMA Questionnaire – “Recyclable Material”

T.C.A. SpA forms: (“Customer Privacy policy”, “Declaration Form”, “Policy on responsibly sourced metals” to be signed for acknowledgement)

Identify the counterparty: name, address, Country and date of incorporation, registration number etc.

Proof of incorporation through documents: (Business register extract, Certificate of Incorporation, Certificate of good standing, Memorandum/Articles of Associations, report from reliable private database)

Identify the beneficial owner(s)- Screening Worldcheck on: Counterparty, Beneficial owner(s), legal representative of the company, shareholders and any other subjects if necessary (based on the risk assessment).

Financial details: balance sheet (if applicable)

Documentation based on the risk assessment such as for example : Counterparty’s policies and procedures (AML-CFT-Anti bribery policy, Responsible supply chain policy) if applicable; Beneficial owners’ IDs, Authorised signatories’ IDs, Shareholders IDs, Licenses, Certifications, Group chart, Annual report, Internet research. Report on site visit (the site visit is scheduled if deemed necessary).

The underlying criteria for the Risk Assessment are based on the following parameters/principles:

- **Risk associated with the Location/Position (Country Risk) of the business being investigated** – Location-Based Risk: it is assigned on the basis of the risk configuration assigned to each country with which a business relationship is in progress based on the assessment of reports and international indices.
- **Risk associated with the Supplier of the materials of the proposed business – Supplier-Based Risk:** it is assigned as a result of the Compliance, Commercial and Environmental investigations and the Due Diligence documents referring to AML and ESG practices are analyzed.

Within this scope, counterparties with the following characteristics are considered **medium risk**:

- Owners/Shareholders or Beneficial Owners with business interests in high-risk countries
- Beneficial Owners considered Politically Exposed Persons (PEP)
- Owning businesses in high-risk sectors such as: arms, gambling, antiques and art industries
- Having carried out activities to source gold from high-risk countries in the past 12 months
- Having provided documentation with obvious discrepancies/inconsistencies or having refused to provide the documentation required

If TCA should learn that the counterparty, its other known upstream companies or its ultimate beneficial owner (UBO) have proved to be money launderers, fraudsters or terrorists, or have been involved in serious violations of human rights laws or in the direct or indirect support to illegal non-state armed groups, the counterparty will be considered **high-risk**.



- **Risk associated with the type of materials of the proposed business – Material-Based Risk:** it is assigned based on the type of procurement of the materials for the core business, for which precious metal refining and recovery activities are requested by the potential counterparty, on the basis of the information obtained through the KYC Questionnaire supplemented, where possible, with publicly available information. **We reiterate and emphasize TCA's decision to deal exclusively with recycled materials;** this limits considerably the risk associated with the type of material. However, materials originating from intermediate refiners or those with a high-risk supply chain or from a business counterparty that supplies from an intermediate refiner with a high-risk supply chain are considered **medium-risk**.

All the collected documents are entered into a system accessible only to authorized persons.

From when the documentation is entered in the software, the software generates a risk level of low, medium or high, as described in the "ASSIGNMENT OF RISK LEVELS TO COUNTERPARTIES" section.

If the risk is Low or Medium, the company may have business dealings with the Customer; if the risk is High, the files are not managed unless there is a formal derogation from the Board of Directors.

In the event of Medium risk, the Compliance Officer must state whether additional monitoring activities will be necessary and indicate which ones, and must apply EDD. If the file is rejected by the Compliance Officer, the Compliance Team is responsible for informing the customer of this outcome.

The combination of the Risk results from the above assessments generates the final risk assessment.

- **Low Risk:** the combination shows the lowest risk for all three assessments. The business relationship is entered into and the counterparty's details are entered into the system. Monitoring with biannual frequency if the business has not shown any risk level increases in the past twelve months.

- **Medium Risk:** the combination shows at least one moderate risk in one of the three assessments. The business activity is started up / continued, but an EDD process is begun, which consists of an obligatory on-site visit (before starting the business relationship or within 6 months if the business relationship already exists), with the strictest annual monitoring frequency. The risk assessment outcome generates immediately a group discussion among the teams involved in the Due Diligence process.

- **High Risk:** the combination shows at least one high risk in one of the three assessments. The due diligence process is halted and the potential relationship is NOT initiated or, if it is already underway, all business activity is interrupted. If TCA has material being refined owned by the counterparty, the material will be processed and delivered and the transaction will be accepted (within a year from when the material is received). The business relationship is ended.

The final risk assessment deriving from the 3 risks assigned by the system is subject to assessment by the Compliance Officer in collaboration with the commercial department, which can, after thorough checks and providing the reasons for it, decide to nevertheless activate the business relationship with the counterparty, except in the cases shown by LBMA RGG v.9 to be "zero-tolerance".

MONITORING THE TRANSACTIONS:

TCA adequately checks and monitors the transactions carried out in every business relationship and is ready to interrupt the activity if any doubts should arise.

When receiving material containing gold, silver, platinum and palladium, TCA receives specific documents and enters the transactional details. Each batch is carefully registered in the transactional system and ensures the complete traceability within the production flows. Specific controls over the materials received (evaluation of the quality through laboratory analysis, transport documents, weight) are performed before refining the incoming material. Regular employee training ensures compliance with the guidelines; any non-compliance is immediately reported directly to the Compliance Officer and to the executive management. TCA accepts transactions only through the banking channel and carefully monitors the consistency of the counterparty's transactions.

MANAGEMENT OF ANY KEY ISSUES:

If, while carrying out normal business activities with existing counterparties, issues should arise to the extent of eliciting an immediate and urgent change/increase in the previously assigned risk level, the teams involved in the



due diligence activities should meet without delay to decide together the actions to take, which could possibly be the temporary or permanent suspension of all commercial activities with the counterparty being investigated.

TRAINING PLAN:

The employees directly involved in the due diligence process are trained on the policy and the related procedures, and according to specific demands.

In addition, training takes place annually and whenever the policy is updated and approved.

1.4. Has the refiner strengthened company engagement with Gold & Silver supplying counterparties, and where possible, assist Gold & Silver supplying counterparties in building due diligence capabilities?

Comments and Demonstration of Compliance:

During the reporting period TCA has continued company engagement with gold and silver supplying counterparts, as well as other suppliers of potentially conflict minerals. In 2013 it was started the process to further modify the supplier agreements so that they make reference to the OECD guidelines. From 2014 to 2022 TCA continued with the approach started in 2013, making always strong reference to the OECD guidelines. According to the Business Policy assumed by the Board of Directors, TCA doesn't deal with small-scale artisanal miners, and the risk to come in contact with raw materials, containing Precious Metals, supplied by counterparts who use mercury in their extractive processes, is strongly reduced, considering also the fact that every ingoing raw or semi-product material is preliminarily subject to specific laboratory analysis (by the company and by third party laboratories) aimed to detect the presence of any kind of deleterious element such as mercury.

TCA shares its supply chain policy with its counterparts, which must be acknowledged and returned signed as part of the documents collected for the due diligence process. All communications and requests take place via email; counterparts are required to share all information requested by LBMA KYC.

TCA supports the principles of responsible sourcing throughout its supply chain. This includes promoting best practices by sharing clear expectations and guidelines with counterparties through supply chain policy, KYC questionnaire and on-site visits. When appropriate, TCA provides guidance on due diligence processes and collaborates with industry stakeholders.

TCA expect to share information with the counterparts concerning the documentary compliance, the source and origin of the materials provided and the Due Diligence requirements.

1.5 Has the Refiner established a company-wide confidential grievance mechanism?

Comments and Demonstration of Compliance:

TCA has developed a mechanism allowing both employees and external parties to raise concerns over the gold and silver supply chain or other identified risks regarding conflict minerals or other compliance issues.

The mechanism consists in a website page [Whistleblowing](#) that allows to report anonymously on the abovementioned matters. The resulting communications are reviewed by the compliance officer. In the event that a communication is delivered anonymously in the website page, a supervisory body will take care of it and investigate on the nature and the kind of grievance raised, and consequently will take proper measures in order to analyze and solve the potential issue caused. At the end of the investigation process the results and the measures adopted will be communicated directly to the stakeholders by the supervisor body. For internal employees, they can directly voice his concern to any person from the management an HR or use the grievance line on TCA spa website for anonymous communication.

During year 2024 there were no grievances reported.



Step 2: RISK IDENTIFICATION AND ASSESSMENT

Compliance Statement with Requirement:
TCA has fully complied with Step 2: Identify and assess Supply chain **Design and implement risk management system:**

2.1 Does the Refiner have a due diligence process to identify risks in the supply chain?

TCA has processes in place to identify the risks in the supply chain.

Comments and Demonstration of Compliance:

TCA has formalized the process and update the Operative Due Diligence and Risk Assessment Policy procedure in line with the activities already carried out. The formalization, needed to be compliant with LBMA RGG v9 requirement, will allow to enforce the risk assessment process and transparency. This document is inspired by the OECD Guidelines, LBMA refiner toolkit, the EU regulation on conflict minerals and the national and international AML regulations.

The Due Diligence Policy provides the following main fundamentals:

- Governance
- Due Diligence Process
- Assignment of Risk Levels to Counterparties
- Risk Management: Enhanced Due Diligence (EDD)
- Monitoring the Transactions
- Management of Any Key Issues
- Training Plan

In 2023, TCA implemented the Due Diligence process on a specifically developed IT system to gather information on counterparties active throughout the year, in order to conduct the risk assessment for each of them.

The structure of the due diligence and risk assessment procedure is outlined as follows:

The Compliance Team sends an email to the counterpart requesting documentation. For each client, the Compliance Team creates a digital folder on the server where documents provided by the client and those downloaded from information agencies are stored. These folders are accessible by the Compliance Team, President of the Board of Directors, Compliance Officer, Global Business Development Manager (GBDM), and Global Sales Manager (GSM).

The system also allocates a risk level based on TCA’s Country Risk Index, which is embedded in the system. TCA regularly updates the country risk analysis, referencing the sources outlined by LBMA (All the Sanctions Lists, Dodd Frank, EU CAHRA, Heidelberg, Fragile State Index, UN Human Rights, FATF, ...).

In case of partial receipt of documents, the Compliance Team prompts the submission of the remaining documents.

Once the documentation is complete, the Compliance Team opens the client's position in the management software and enters the required data and previously collected documents.

At the end of the assessment for each counterparty, a risk level of Low, Medium, or High is assigned, in accordance with the TCA Due Diligence Policy.

The judgment of the Compliance Officer will be communicated through a notification to the compliance team in order to perform a double check on any outcome. TCA maintains business relationships even with counterparts whose risk is assessed as Medium, provided that an Enhanced Due Diligence (EDD) is conducted, as established in its Due



Diligence policy. In the case of a 'High' risk, TCA's default course is not to initiate/terminate the business relationship, with the Compliance Officer having the option to reassess the decision, providing justification.

The fundamental criteria for Risk Assessment are based on the location of the business under investigation (Origin of material, transportation routing), the supplier of materials involved in the proposed business and the Type of materials in the proposed business.

The new operating system adopted following the implementation of the action needed to cover the gap identified in the previous year's compliance report, is currently active and operational.

Furthermore, as defined in Step 1.2, in 2020 TCA started enforcing methods, processes and documents that integrate the counterparty assessment system with a detailed evaluation of environmental and social aspects.

During 2024 TCA carried out thirty site visits, moreover it maintained continuous communication with all the counterparties, also requesting further pieces of evidence and documents, when considered necessary. The on-site visit is performed by the Commercial Manager, the General Manager and the Compliance Officer. If the Assignment of Risk Level procedure, shows a Medium Risk Level, the business activity is started up / continued, but an EDD process is begun, which consists of an obligatory on-site visit (before starting the business relationship or within 6 months if the business relationship already exists), with the strictest annual monitoring frequency. If the mandatory site-visit is not possible, the business relationship will not begin or, if already started, it will be immediately stopped. The risk assessment outcome generates immediately a group discussion among the teams involved in the Due Diligence process.

Among the activities carried out by TCA on a daily basis there is the continuous communication with the counterparties in order to support them in the compilation of the requested Due Diligence documents, and to ensure the truthfulness of the information provided during the due diligence process.

The Compliance Officer and his team assess the potential risks taking into consideration also what stated in OECD due diligence guidance as set out in the Annex II. If risks are identified with new or existing business partners TCA will deny acceptance of the new business partner or cancel business with already existing partners.

In case of disagreement with the assessment of the compliance officer, the issue will be escalated to the CEO or CFO for final decision; no such escalation was necessary during the reporting period. Senior management retains the ultimate control and responsibility.

2.2 How does the refiner classify identified risks in light of the standards of its due diligence system?

Comments and Demonstration of Compliance:

Supply chain due diligence comprising all measures required by LBMA is performed before entering into a business relationship with any gold and silver or other conflict minerals supplying counterparty.

Based on TCA's Business model and as decided by the Board of Directors, TCA doesn't deal with precious metals that originated from/transited by high risk countries; moreover TCA doesn't deal with any mined precious metal.

In doing so, the occurrence of dealing with High risk counterparties is extremely limited.

Each counterparty is checked thoroughly via the counterparty's documents check, the main database (World-Check One report, Cerved Report, Dun & Bradstreet Database), and the pieces of information obtained by the KYC.

In case this process should highlight any point of concern, further documents are requested before deciding whether or not to enter in business with the counterparty.

In addition, TCA conducts appropriate scrutiny and monitoring of transactions undertaken through the course of the relationship and is ready to interrupt business where concerns should arise.

TCA has formalized the process and update the Operative Due Diligence and Risk Assessment Policy procedure in line with the activities already carried out. The formalization, needed to be compliant with LBMA RGG v9 requirement, allows to enforce the risk assessment process and transparency.



2.3. Has the Refiner undertaken EDD measures for identified high-risk supply chains?

As described in the previous paragraph 2.2, TCA doesn't primarily deal with precious metals that originated from/transited by high risk countries; moreover TCA doesn't deal with any mined precious metal.

In doing so, the occurrence of dealing with High risk counterparties is extremely limited.

The Due Diligence process is carried out for each counterparty, and implemented by a continuous monitoring.

The Enhanced Due Diligence process consists of a strict monitoring and site visits. In 2024, site visits were conducted for 30 counterparties. Seven additional counterparties have been integrated in the 2025 site visit plan after considerations emerged during 2024. TCA doesn't deal and doesn't start any kind of relationship with intermediate refiners with high-risk supply chain who could potentially provide some high-risk recycled gold.

With a perspective of continuous improvement and in light of the enhancements made to the process following the formalization of the Due Diligence Policy, TCA has implemented an annual site visit plan that it is aligned with the Guidance, the Site visits are conducted only for medium- and high-risk counterparties. These visits are performed by the Compliance Officer and the General Manager. The site visits are primarily conducted virtually; however, whenever possible, they carry out on-site visits.

Step 3: RISK MANAGEMENT

Compliance Statement with Requirement:

TCA has fully complied with Step 3: **Design and implement risk management system:**

3.1 Does the Refiner have a process to respond to the identified risks by either (i) mitigating the risk while continuing to trade, (ii) mitigating the risk while suspending trade or (iii) disengagement from the risk?

Comments and Demonstration of Compliance:

TCA has set-up an automated and ongoing screening of all business partners for identifying risks. Based on the risk assessment a regular assessment of all business partners and transactions is established. In addition any ad-hoc identified risk brought up by any stakeholder will be carefully assessed by the Compliance officer and his team and necessary actions/measures decided.

Risk assessments and due diligence reviews are conducted on an ongoing basis. In practice, each time a supplier initiates a new transaction, the relevant file is reviewed and updated, regardless of the previously assessed risk level. Therefore, reviews are performed on all active suppliers annually.

As described in the previous paragraph 2.2, TCA doesn't deal with precious metals that originated from/transited by high risk countries; moreover TCA doesn't deal with any mined precious metal.

In doing so, the occurrence of dealing with High risk counterparties is extremely limited.

The initial evaluation of the counterparty is extremely strict, several business relations were not initiated due to lacking pieces of information in the ones provided by the counterparty.

In 2024, no mitigation measures were required as no counterparties were identified as posing elevated risk. However, TCA has formal procedures in place to respond to any identified risk in line with the LBMA RGG v9. Depending on the severity and nature of the risk, TCA may: Continue the relationship with clearly defined and monitored mitigation measures and an improvement plan; Suspend the relationship while mitigation measures are implemented; Terminate the relationship if the risks cannot be mitigated or if cooperation from the counterparty is lacking.



Beside any risk mitigation procedure, TCA obtained in December 2022 the RJC certification to ensure traceability and responsible sourcing.

TCA has set up a strong internal management structure to support supply chain due diligence: the Compliance Officer in charge directly reports to the Board and to the CEO, in case any concern over a counterparty should arise.

Further information and details of how TCA's systems, procedures, processes and controls have been implemented to align to the specific requirements in the LBMA Responsible Gold Guidance and LBMA Responsible Silver Guidance have been set out in their responsible gold and silver policy which is available on their company website.

TCA has issued a Management Review, as for the Responsible Guidance Management System, which provide full explanations and clarifications on the following matters: 1) Information relating to the Gold & Silver Supply Chain and Platinum & Palladium Supply Chain; 2) New Contractual Relationships of 2024; 3) Update on the Responsible Precious Metals Policy; 4) Rh Sponge accreditation at LPPM; 5) Examination and in-depth analysis of the CheckLists aimed at the Assessment of Suppliers; 6) Activation and use of the specific IT platform relating to the Due Diligence & Risk Assessment Procedure; 7) Country Risk Assessment: activation of a relationship with LSEG for the acquisition of information on Country Risk; 8) Training activities carried out during the 2024 financial year: in particular, planning and launch of training in the field of Anti-Money Laundering and Risk Assessment Policy.

TCA has formalized the process and update the Operative Due Diligence and Risk Assessment Policy procedure in line with the activities already carried out. The formalization, needed to be compliant with LBMA RGG v9 requirement, allows to enforce the risk assessment process and transparency.

TCA is continuously engaged in monitoring and tracking the performance for risk mitigation: the Compliance Team, with the Sales Team and Managing Director, periodically get together and delve deeper on the results and approach adopted and that they deem to be used in order to improve the risk reduction.

TCA has strengthened the chain of custody and traceability systems for supply chains under risk mitigations: in particular, the precious metals refined and marketed by TCA are managed through daily accounting records and archiving on computer support: these databases are maintained and managed internally on the AS 400 Information System and on IBM hardware support. For each entry of material to be refined containing Precious Metals or Pure Precious Metals, an accounting entry is made by the Responsible of the receiving department, which necessarily and inevitably includes: the commercial counterparty, the country of origin, the relevant production line, the classification of the material according to the LBMA criteria, the purity, the gross weight of the materials and the weight of the related precious metals.

Step 4: INDEPENDENT THIRD-PARTY ASSURANCE

Compliance Statement with Requirement:

TCA has fully complied with Step 4: **Obtain independent assurance on conformance with RGG & RSG**

Comments and Demonstration of Compliance:

TCA selected Forvis Mazars among LBMA's Approved Service Providers List ensuring its independence during the selection and engagement process. TCA has engaged Forvis Mazars to perform a reasonable level of independent external assurance on compliance against the LBMA Responsible Gold Guidance, version 9 and Responsible Silver Guidance, version 2, for the period 1 January 2024 to 31 December 2024.

TCA overall conclusion



Table 3: Management conclusion

Is the refiner in compliance with the requirements of the LBMA Responsible Gold Guidance and LBMA Responsible Silver Guidance for the reporting period?

In conclusion, TCA implemented a management systems, procedures, processes and practices to conform to the requirements of the LBMA Responsible Gold Guidance version 9 and Responsible Silver Guidance, version 2, as explained above in Table 2, for the reporting year end 31 December 2024. TCA is committed to continuous improvement, and any corrective actions identified will be monitored internally on a regular basis. During 2024, TCA has continued to adopt and use the formalized the Operative Due Diligence and Risk Assessment Policy procedure formalized during 2023, in line with the activities already carried out. The utilization of the above mentioned Due Diligence and Risk Assessment Procedure has carried out and achieved right results as provided and requested by LBMA Responsible Gold Guidance version 9 and Responsible Silver Guidance version 2, as it allows to enforce the risk assessment process and transparency.

Other details

Table 4: Other report comments

If users of this report wish to provide any feedback to TCA with respect to this report, they can contact the compliance officer: a.susi@tcaspa.com.

Arezzo, September 17th, 2025

Signature

Mr. Tommaso Chiarini – Board Director