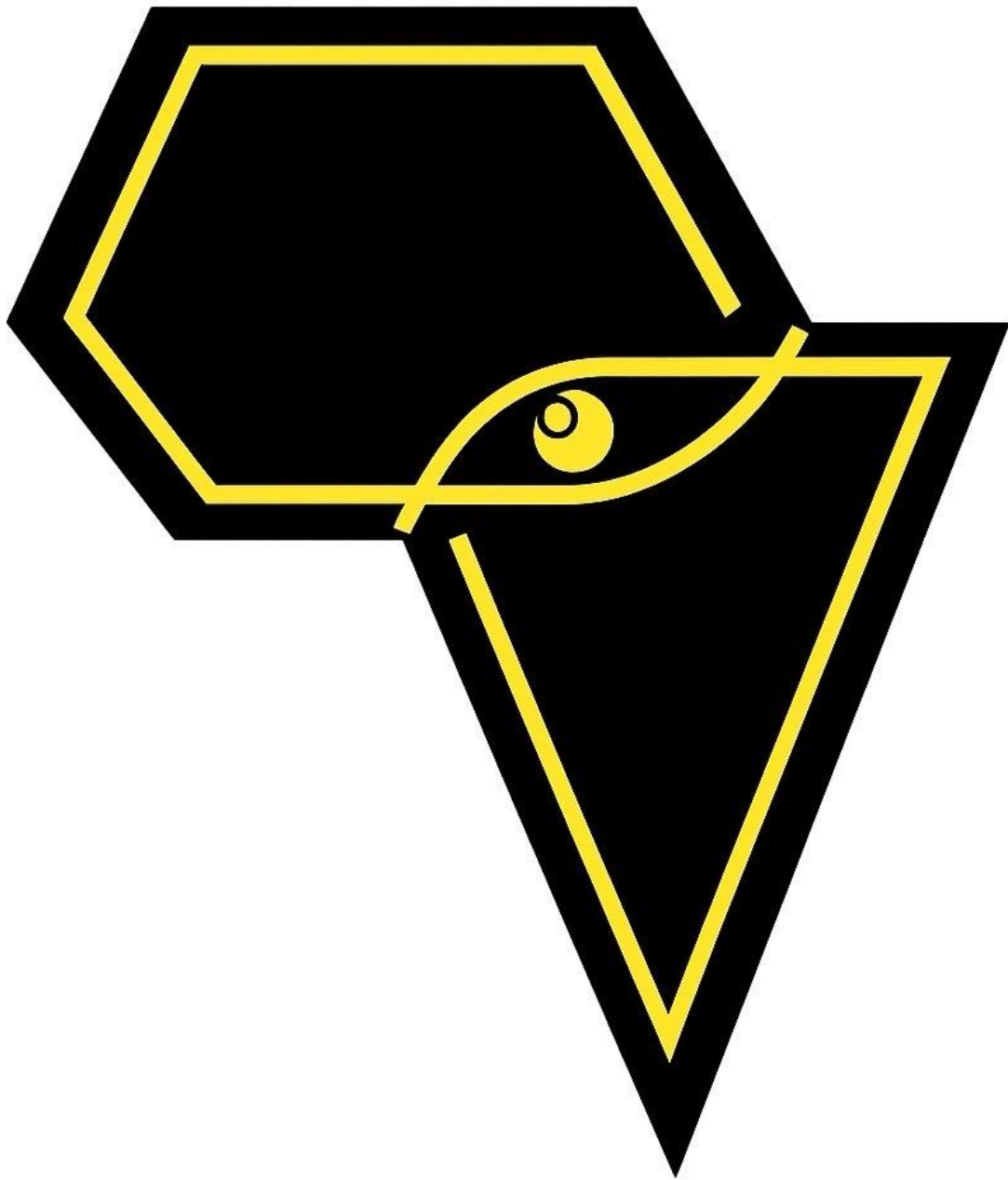


EYES OF AFRICA LIMITED

PRECIOUS METALS SUPPLY CHAIN POLICY - 2026





Document Review Schedule

Initial Approval

Document Name:	Precious Metals Supply Chain Policy
Document Number:	EOA LTD.2026.01
Document Version:	1.0
Approved By:	Board of Directors
Approval Date:	08/05/2026
Effective Date:	01/06/2026

Amendment Instructions and Version Control

- a) The initial document version is 1.0
- b) Subsequent amendment / addition of paragraphs will change the second part (0) of the Document Version to 1.1 and increase with subsequent changes in paragraphs
- c) Subsequent amendment / addition of clauses will change the first part (1) of the Document Version to 1.0



Acronyms

Terms	Description
LBMA	London Bullion Market Association
AML/CFT	Anti-Money Laundering/ Countering the Financing of Terrorism
DDTrO	Due Diligence and Transparency regulations concerning Minerals and Metals from Conflict-Affected Areas and Child Labor
KYC	Know Your Customer
KYP	Know Your Product
OECD	Organization for Economic Co-operation and Development
PMCA CAHRA's	Control of Trade in Precious Metals and Precious Metal Articles Conflict Affected and High-Risk Areas
RJC	Responsible Jewelry Council
RGG	Responsible Gold Guidance
RSG	Responsible Silver Guidance



1. INTRODUCTION

Eyes of Africa Limited (Eyes of Africa) is fully committed to sourcing all materials and services within our supply chain in an ethical and responsible manner, ensuring that our sources of supply are legitimate, transparent and fully respect internationally recognized human rights, simultaneously committing to the avoidance of contributing to serious human rights violations; direct and/or indirect support to non-state armed groups or public/private security forces who unlawfully control sites or supply chains; bribery, corruption, money laundering, terrorist financing; tax evasion; or fraudulent misrepresentation of origin and trading in contravention of applicable sanctions and laws.

Eyes of Africa shall strive to comply with and uphold the highest standards established by the OECD Due Diligence Guidance and the LBMA Responsible Gold Guidance. To that end, Eyes of Africa, commits to the implementation of the OECD Five-step Due Diligence Framework namely:

- Establishing strong company management systems;
- Identify and assess risks in the supply chain;
- Design and implement a management strategy to respond to identified risks;
- Arranging for an independent third-party audit of supply-chain due diligence; and
- Reporting publicly on supply-chain due diligence.

These standards and associated legal frameworks are designed to combat the risks outlined in Annex II of the OECD Guidance, including but not limited to, money laundering, terrorism financing and serious human rights violations at all stages of the precious metals supply chain. Eyes of Africa recognizes that due diligence is an ongoing and progressive process, therefore, commits to continuous improvement by building long-term, transparent relationships with suppliers (i.e., legitimate Artisanal and Small-scale Miners (ASM)) and relevant stakeholders.

2. SCOPE

This policy applies to all employees of Eyes of Africa, including full-time, part-time, and temporary employees, as well as suppliers, customers, contractors, interns, and all members of the Board of Directors of Eyes of Africa in the execution of their respective roles, duties, decision-making and conduct. Eyes of Africa requires all its employees and business partners to actively participate in and comply with this policy or have their own policy aligned with LBMA's Responsible Gold Guidance and Responsible Silver Guidance (RSG) to assist us in meeting all the requirements of the OECD Guidance framework. All Eyes of Africa suppliers will be subject to a risk-based assessment prior to onboarding and on an ongoing basis thereafter.

3. PURPOSE OF THE POLICY



The purpose of this policy is to set out Eyes of Africa's commitment to responsible sourcing and ensuring traceability of all material throughout its supply chain. This includes the application of due diligence practices to identify and mitigate potential risks related to serious cases of child labor, direct/indirect support to non-state armed forces, forced labor, illegal mining activities, benefiting from armed conflict, financial corruption and violence which contribute to human right violations.

Eyes of Africa shall conduct its business with the highest ethical, moral, and social responsibility standards, inclusive of which, is the commitment to fair and lawful commercial practices. Eyes of Africa shall utilize LBMA Toolkits and guidance documents as required to support the implementation of this policy.

Threat Financing

Eyes of Africa will not, tolerate or knowingly contribute to, profit from, assist with, or facilitate any party's commission of:

- any forms of torture, cruel, inhuman, or degrading treatment;
- any forms of forced or compulsory labor, which involve work or service extracted from a person under the threat of penalty and without voluntary consent;
- the worst forms of child labor;
- other gross human rights violations and abuses, including widespread sexual violence; war crimes or other serious violations of international humanitarian law, crimes against humanity, or genocide.

Eyes of Africa will not provide indirect/direct support to illegitimate non-state armed groups or public/private security forces acting unlawfully in the extraction, trade, processing, or export of minerals in its supply chain. This includes sourcing minerals from, making payments to, or providing logistical or material assistance to such groups or their affiliates who: illegally control mine sites, transport routes, trading points of minerals, and upstream actors in the supply chain and illegally tax or extort money or minerals at access points to mine sites, along transport routes, or at trading points of minerals and last but not least illegally tax or extort intermediaries, export companies, or international traders. We recognize that the role of public or private security forces at mine sites or along transportation routes should be solely to maintain the rule of law, safeguard human rights, and protect legitimate extraction and trade routes from interference from illegitimate extraction and trade.

Eyes of Africa will comply with AML/CTF Act (CAP.423 RE 2023, which is aligned with international FATF Standard and prohibit bribery, facilitation payments and fraudulent misrepresentation of mineral origin, taxes, fees or royalties and requires transparency, full compliance and cooperation with this policy and relevant AML/CTF policies of Eyes of Africa from all its partners in the supply chain to ensure that our sourcing, especially in areas designated as Conflict Affected and High-Risk Areas (CAHRAs) is compliant with the



OECD Guidelines for Responsible Supply chains of Minerals from Conflict- Affected and High- Risk Areas (OCED Guidance).

Eyes of Africa will apply a robust Know Your Customer, Know Your Product and Anti-Money Laundering Policy to identify our customers and ensure compliance with applicable sanctions and laws and CAHRA determinations shall be based on geographic and supply-chain risk indicators using OECD-approved sources and updates this assessment annually or when sourcing circumstances change.

Environmental, Social & Governance (ESG) Factors

Eyes of Africa seeks to source gold and silver bearing materials that are compliant with environmental, health, safety and labor laws and regulations in the country of operation and with the company policy. We recognize that mercury usage is mainly in Artisanal and Small-scale Mining (ASM) and Eyes of Africa is committed to assisting legitimate ASMs and local traders in establishing processes to use mercury in a safe manner and limit negative impact on the environment and health and safety of all involved and/or find alternative solutions to mercury.

Eyes of Africa shall engage with upstream producers to encourage them to comply with international Cyanide Management Code and the Hazardous Waste Management, under the NEMC's 2021 regulations, aimed at curbing illegal storage, handling and disposing of hazardous chemicals which pose significant health and environmental risks, thereby improving their supply chain practices from mine to market. Furthermore, Eyes of Africa will not source gold/silver bearing material where such sourcing would constitute an OECD Annex II risk that cannot be mitigated. Eyes of Africa will encourage policies and practices in support of fair remuneration, working hours, collective bargaining, diversity, disputes and safeguarding of workers.

Eyes of Africa shall, where possible, engage with the communities and management programmers in locations in which they operate to support efforts on issues such as community resettlement, land acquisition, cultural heritage sites and indigenous people, mine closure planning and safeguarding of vulnerable populations and encourage the management of business integrity and ethical conduct and support the implementation of relevant initiatives such as the Tanzania Extractive Industry Transparency Initiative (TEITI) which aim to enhance transparency, accountability, public awareness and informed debate, strengthen governance and monitor local content (i.e., the involvement of Tanzanian companies in supply chain) and the impact on ASMs.

Risk Management

Eyes of Africa shall develop and implement mitigation plan/strategies for identified risks, including contingency plans, regularly monitoring and reviewing risk assessments and adapting to changing circumstances. Such risk mitigation plans/strategies would be



checked and approved by the Chief Risk Officer and Compliance Committee who could make a finding of:

- continued relationship with improvement plan,
- suspension of relationship; and/or
- termination of relationship.

Such findings and management systems will be implemented and documented. The overall accountability for Responsible Sourcing at Eyes of Africa shall rest with the Chief Risk Officer, with ultimate oversight by the Board.

Due Diligence

Eyes of Africa is obligated to verify the legitimacy of sources and conduct due diligence aligned with the OECD Annex II and the Gold Supplement of the OECD Guidance before entering a new business.

Due Diligence measures may include:

- conducting Know Your Customer (KYC) and Know Your Product (KYP);
- Verifying validity of documents such as dealer's license, authorized seller (PMLs holder), and ownership compliance as mandated by Mining Act and the mine site;
- Verification of regulatory and legal compliance in accordance with national law on tax requirements and royalties;
- Identification and verification of Ultimate beneficial Owners (UBO); and
- Site visits where risk indicators exist.

Engagement with Counterparties

Eyes of Africa is committed to building long-term relationships with upstream producers, based on trust and mutual recognition. In conducting the appropriate due diligence on our suppliers, Eyes of Africa will require its gold supplying counterparties to commit either to Eyes of Africa's Supply Chain Policy or the counterparties' own gold supply chain policy which is completely OECD Annex II aligned.

Eyes of Africa may engage with government departments, industry initiatives and other stakeholders to support responsible sourcing practices.

Establishing a Traceability System

Eyes of Africa will maintain systems of controls to support visibility and transparency over its supply chain. This traceability system will identify the origin of minerals and the upstream supply chain actors involved. Records of such will be maintained in accordance with the



LBMA, legal requirements and company policy.

Grievance Mechanism

Eyes Of Africa Ltd Refinery shall establish a grievance mechanism allowing internal and external stakeholders to raise concerns related to Eyes of Africa's supply chain risks. Such grievance mechanism shall be accessible, independent, transparent, respectful and contribute towards continuous improvement.


Continuous Education and Training

Eyes of Africa shall ensure that ongoing education and training programs are regularly conducted to keep all relevant employees, involved in the responsible sourcing of precious metals in the Eyes of Africa supply chain, up to date on standards, due diligence, Know Your Customer (KYC), and Know Your Product (KYP) best practices. Such training records shall be maintained for minimum of 5 years and staff members that take part in it.

Legislative and/or Business Context

Eyes Of Africa shall adhere to the requirements of the OECD Due Diligence, LBMA RGG/RSG. We will report on our conformance to the RGG annually, covering the supply chain due diligence activities over a 12-month reporting period and publishing the annual Responsible Sourcing Report in line with LBMA RGG requirements.

Approved by the Board of Directors and Signed for and on behalf by:

Signature: 
Full Name: FERENC MOLNAR
Designation: Managing Director
Date: 08/05/2026