FREMADA

FREMADA GOLD, INC. · RESPONSIBLE BUSINESS

Our Policies

2026

As a member of the Responsible Jewellery Council (RJC), Fremada Gold is certified against the RJC Code of Practices. This document brings together our public policies on responsible business, anti-bribery, health and safety, and the environment, and explains how anyone can raise a concern with us.

Fremada Gold, Inc.
2 West 45th Street, Suite 1605, New York, NY 10036
fremada.com · Family-owned since 1969

RESPONSIBLE JEWELLERY COUNCIL

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APPROVED NOVEMBER 11, 2026

Our Annual Sustainability Statement, which reports on how we put these policies into practice, is published separately on fremada.com. Page numbers refer to this document; each policy also keeps its own page numbering.

GRIEVANCE MECHANISM

How to raise a concern

Open to anyone: employees, contractors, suppliers, customers, community members and the public.

EMAIL	avi@fremada.com
PHONE OR IN PERSON	Avi Shapira, Controller · 212-921-8829
POST	Fremada Gold, Inc., 2 West 45th Street, Suite 1605, New York, NY 10036

What happens next

1. We acknowledge your concern within 5 business days.
2. An appropriate member of staff reviews it and contacts you if anything needs clarifying.
3. We investigate it thoroughly and fairly.
4. We aim to give you a full written response within 30 calendar days. Complex cases may take longer, and we will keep you informed.
5. If your concern is upheld, we agree a remedy with you and record the outcome.

Your rights

- Raise your concern anonymously
- Have your identity kept confidential
- Be free from retaliation
- Write in your preferred language
- Receive a written outcome
- Request a review if you are not satisfied

Using this mechanism does not affect your right to seek remedy through any other channel, including government agencies, courts or industry bodies. The full process is set out in the Responsible Business Practices Policy, page 9 of this document.

Fremada Gold, Inc.

Responsible Business Practices Policy

Date: November 11, 2026

Responsible Jewellery Council (RJC) Commitment

Fremada Gold, Inc. (hereinafter referred to as “the Company”) is a member of the Responsible Jewellery Council (RJC).

https://www.responsiblejewellery.com/member/fremada-gold-inc/

The RJC is a standards-setting organisation established to advance responsible, ethical, human rights, social and environmental practices throughout the gold, silver, platinum group metals, diamond, coloured gemstone and lab-grown materials jewellery supply chain. The RJC has developed a benchmark standard for the jewellery supply chain and credible mechanisms for verifying responsible business practices through third-party auditing.

As an RJC member, we commit to operating our business in accordance with the RJC Code of Practices (COP) Standard. We commit to integrating ethical, human rights, social and environmental considerations into our day-to-day operations, business planning activities and decision-making processes, and to upholding the principles and intent of the RJC Code of Practices as relevant to the scope of our business.

Human and Labour Rights

We are committed to respecting all human rights in our own operations and business relationships in accordance with the Universal Declaration of Human Rights (UDHR), the UN Guiding Principles on Business and Human Rights, and relevant conventions of the International Labour Organization (ILO). Our commitments include:

Workplace Conduct

All forms of violence and harassment in the workplace are prohibited, including but not limited to corporal punishment; harsh or degrading treatment; sexual or physical harassment; mental, physical, verbal or sexual abuse; retaliation; coercion; and intimidation. This applies to both direct and indirect harassment in any form, including harassment based on:

- Race, colour, ethnicity or caste
- National origin or religion
- Social aspects, including minority status
- Migrant worker status
- Disability or genetic information
- Gender, sexual orientation or other LGBTQ+ status
- Union membership or political affiliation
- Marital status

Child Labour and Forced Labour

- We will never engage in or knowingly support child labour (including the worst forms of child labour) as defined by ILO Conventions 138 and 182.
- We will never engage in or knowingly support forced labour as defined by ILO Convention 29, including bonded labour, deceptive recruitment, human trafficking and indentured or involuntary prison labour.

Non-Discrimination

We prohibit all forms of discrimination, including but not limited to discrimination based on race, colour, ethnicity, caste, national origin, religion, disability or genetic information, gender, sexual orientation, union membership, political affiliation or participation in a legal strike, marital status, parental or pregnancy status, physical appearance, HIV status, age, or any other personal characteristic unrelated to the inherent requirements of the work.

Further Commitments

- To provide a safe and healthy working environment for all employees and on-site contractors.
- To promote human rights in our dealings with business partners and other relevant stakeholders.
- To promote worker diversity, equity and inclusivity (DEI) at all levels of the organisation and across functions, including recruitment, professional development and mobility, and equitable employment conditions.
- To respect the rights of our employees to associate freely with worker unions of their choice and to engage in collective bargaining without fear of retaliation.

Bribery and Corruption

We prohibit bribery and corruption in all our business practices and transactions, including those carried out by agents acting on our behalf. For the purpose of this policy, bribery is defined as giving, offering or receiving any undue advantage to or from:

- A public or government official;
- A political candidate, party or official; or
- Any private sector employees, directors, officers, or their agents or representatives.

Anti-Money Laundering and Financing of Terrorism

We commit to not engaging in or contributing to money laundering or the financing of terrorism. The Company has implemented Anti-Money Laundering (AML) and Know Your Counterparty (KYC) procedures to:

- Establish the identity of all counterparties;
- Verify that counterparties and, if applicable, beneficial owners are not named on relevant government lists for individuals or organisations implicated in money laundering, fraud or involvement with prohibited organisations and/or those financing conflict;
- Maintain an understanding of the nature and legitimacy of the businesses operated by counterparties; and
- Monitor transactions for unusual or suspicious activity.

Environmental Management

We have established an environmental management system relevant to the scope of our business. We will take all reasonable steps to minimise and/or mitigate adverse environmental impacts associated with our direct business operations.

Product Disclosure

We will not knowingly make any untruthful, misleading or deceptive representation, or make any material omission, in the selling, advertising or marketing of jewellery products and materials. We further commit to disclosing information on the physical characteristics of our jewellery products and materials in accordance with the RJC Code of Practices Standard.

Supply Chain Policy – Conflict-Affected and High-Risk Areas (CAHRAs)

General Commitment

This policy confirms our commitment to respect human rights, avoid contributing to the financing of conflict, and comply with all relevant UN sanctions, resolutions and laws.

As an RJC member, we commit to demonstrating through independent third-party verification that we:

- Respect human rights according to the Universal Declaration of Human Rights and the ILO Declaration on Fundamental Principles and Rights at Work;
- Do not engage in or tolerate bribery, corruption, money laundering or financing of terrorism;
- Support transparency of government payments and rights-compatible security forces in the extractives industry;
- Do not provide direct or indirect support to illegal armed groups;
- Enable stakeholders to voice concerns about the jewellery supply chain; and
- Are implementing the OECD Due Diligence Guidance 5-Step Framework as a management process for risk-based due diligence for responsible supply chains of minerals from conflict-affected and high-risk areas.

We also commit to using our influence to prevent abuses by others.

Serious Abuses

Regarding serious abuses associated with the extraction, transport or trade of gold, silver, platinum group metals: we will neither tolerate nor profit from, contribute to, assist or facilitate the commission of:

- Torture, cruel, inhuman and degrading treatment;
- Forced or compulsory labour;
- The worst forms of child labour;
- Human rights violations and abuses; or
- War crimes, violations of international humanitarian law, crimes against humanity or genocide.

We will immediately stop engaging with upstream suppliers if we find a reasonable risk that they are committing the abuses described above, or sourcing from or being linked to any party committing such abuses.

Non-State Armed Groups

We will not tolerate direct or indirect support to non-state armed groups, including procuring gold, silver, platinum group metals from, making payments to, or otherwise helping or equipping non-state armed groups or their affiliates who illegally:

- Control mine sites, transportation routes, or points where minerals are traded and upstream actors in the supply chain; or
- Tax or extort money or minerals at mine sites, along transportation routes, or at points where minerals are traded, or from intermediaries, export companies or international traders.

We will immediately stop engaging with upstream suppliers if we find a reasonable risk that they are sourcing from, or are linked to, any party providing direct or indirect support to non-state armed groups.

Security Forces

We affirm that the role of public or private security forces is to provide security to workers, facilities, equipment and property in accordance with the rule of law, including law that guarantees human rights. We will not provide direct or indirect support to public or private security forces that commit serious abuses or that act illegally as described above.

Bribery and Origin Misrepresentation

We will not offer, promise, give or demand bribes, and will resist the solicitation of bribes, to conceal or disguise the origin of gold, silver, platinum group metals, or to misrepresent taxes, fees and royalties paid to governments for the purposes of extraction, trade, handling, transport and export of such materials.

Money Laundering

We will support and contribute to efforts to eliminate money laundering where we identify a reasonable risk resulting from, or connected to, the extraction, trade, handling, transport or export of gold, silver and platinum group metals

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The Company expects all of its employees, suppliers and, where applicable, their subcontractors, to take all steps necessary to ensure that this policy is adhered to.

Policy Endorsement

This policy is endorsed by:

Name and Position:	**Date:**
Avi Shapira, Controller	November 11, 2026

Grievance Mechanism

Fremada Gold, Inc. (hereinafter referred to as "the Company") is committed to responsible business practices and to treating all individuals and communities with fairness and respect. We recognise that workers, suppliers, customers, and community members may sometimes have concerns or complaints about our activities. This page explains how to raise a grievance with us, what to expect when you do, and your rights throughout the process.

Our grievance mechanism is open to anyone, including workers, contractors, suppliers, local community members, and members of the public. All concerns are taken seriously and handled fairly and confidentially.

How to Contact Us

You can raise a concern or complaint using any of the channels below. Concerns may be submitted in writing, by telephone, or in person. You may submit a concern anonymously if you wish — please indicate this when you make contact.

Email	avi@fremada.com
Post	2 West 45th Street, Suite 1605, New York, NY 10036
In person / phone	Avi Shapira, Controller, 212-921-8829 ext. 103

You may write to us in your preferred language. Where necessary, we will arrange translation or interpretation to ensure we understand your concern fully.

What Happens Next

Once we receive your concern, we follow a clear process to investigate and resolve it as quickly as possible.

1	**Acknowledgement**	We acknowledge receipt of your concern within 5 business days.
2	**Initial review**	An appropriate member of staff reviews your concern and contacts you if clarification is needed.
3	**Investigation**	We investigate your concern thoroughly, involving relevant personnel at the appropriate level.
4	**Response**	We aim to provide a full written response within 30 calendar days. Complex cases may take longer — we will keep you informed.
5	**Resolution & review**	If your concern is upheld, we agree appropriate remedy with you and record the outcome. We review all outcomes to prevent similar issues in future.

Your Rights

The following rights apply to everyone who uses this mechanism:

Raise your concern anonymously	Use external remedies at any time
Have your identity kept confidential	Receive a written outcome
Be free from retaliation or reprisal	Request a review if you are unsatisfied

Confidentiality and Protection from Retaliation

Confidentiality. Your identity and the details of your concern will be kept strictly confidential. Records are retained securely and shared only with those who need to be involved in the investigation. Where you have requested anonymity, this will be respected throughout.

No retaliation. The Company strictly prohibits any form of retaliation, intimidation, or adverse treatment against anyone who raises a concern in good faith. If you believe you have experienced retaliation, please contact us immediately using the details above.

External Remedies

Using this mechanism does not affect your right to seek remedy through any other available channel. You may at any time before, during, or after using this mechanism refer your concern to external bodies, including government agencies, labour authorities, industry regulators, courts, or any other administrative or judicial remedy available in your jurisdiction. We will never use the existence of this mechanism as a reason to discourage you from pursuing external options.

If You Are Not Satisfied

If you are not satisfied with the outcome of your concern, please let us know in writing within 14 calendar days of receiving our response. Your case will be escalated to senior management for independent review. You will receive a written outcome of that review within 20 calendar days.

This mechanism is reviewed annually to ensure it remains effective, accessible, and aligned with internationally recognised human rights standards.

Fremada Gold, Inc.

Anti-Bribery Policy and Procedure

Document Control

Version	Date	Approved by
1.0	November 11, 2026	Avi Shapira (Controller)

1. Purpose

Fremada Gold, Inc. (hereinafter referred to as “the Company”) is committed to conducting all of its business activities honestly, ethically and with integrity. The Company has a zero-tolerance approach to bribery and corruption in any form.

This Policy and Procedure sets out the standards of conduct required of all those acting on behalf of the Company, provides practical guidance on recognising and responding to bribery-related risks, and establishes the systems in place to manage those risks. It applies to all employees, directors, officers, agents, consultants, contractors and any other individuals or organisations acting on the Company’s behalf, wherever they are located.

This document supports the Company’s compliance with RJC Code of Practices provision COP 11 (Bribery and Facilitation Payments) and relevant internationally recognised anti-bribery standards, including the OECD Anti-Bribery Convention and the UN Convention Against Corruption.

2. Definitions

For the purposes of this Policy:

- **Bribery** means the offering, giving, receiving, requesting or accepting of any financial or other advantage, directly or indirectly, as an inducement or reward for action that is improper, dishonest or in breach of trust. This includes bribing public officials, politicians, private individuals and organisations.
- **Corruption** means the abuse of entrusted power for private gain. Bribery is a form of corruption.
- **Facilitation payment** means a payment made to a public official to expedite or secure the performance of a routine government action to which the payer is already legally entitled.
- **Gift or hospitality** means anything of value provided to or received from a third party, including meals, entertainment, travel, accommodation, or physical gifts.
- **Public official** means any person holding a legislative, administrative or judicial position, any person exercising a public function, and any official or agent of an international organisation.

3. Policy Statement

The Company strictly prohibits:

- All forms of bribery and corruption in any of its business practices and transactions, whether carried out directly or through agents acting on its behalf;
- Facilitation payments of any kind, whether to public officials or private parties; and
- Political donations of any kind.

All those covered by this Policy are required to conduct themselves in accordance with it at all times. The Company will not accept any business outcome — whether a contract, regulatory approval, or any other advantage — that has been obtained through bribery or corrupt conduct.

The Company will take all reasonable steps to ensure that agents and other third parties acting on its behalf are aware of this Policy and comply with equivalent standards.

4. Protections and Non-Retaliation

Any person covered by this Policy who, in good faith:

- Raises a concern about suspected bribery or corruption;
- Refuses to participate in bribery or pay a facilitation payment; or
- Reports actual or suspected misconduct under this Policy,

will be protected from any penalty, adverse treatment, or retaliation by the Company, even if their refusal to act results in the Company losing business.

Any member of staff who subjects another to retaliation for raising concerns in good faith will be subject to disciplinary action.

5. Roles and Responsibilities

5.1 All Personnel

Every person covered by this Policy is responsible for:

- Reading, understanding and complying with this Policy;
- Completing any training on anti-bribery and corruption provided by the Company;
- Reporting any actual or suspected breaches of this Policy promptly (see section 11); and
- Seeking guidance before taking any action that may conflict with this Policy.

5.2 Responsible Person(s)

Marc Elmann is responsible for:

- Overseeing the Company’s anti-bribery and corruption programme;
- Maintaining awareness of applicable legal and regulatory requirements;
- Ensuring this Policy and supporting procedures are kept current and communicated;

- Maintaining the Gifts and Hospitality Register (entries are approved or declined by Avi Shapira (Controller));
- Receiving, investigating and recording reports of suspected bribery or corruption; and
- Providing advice and guidance to staff on compliance with this Policy.

6. Gifts and Hospitality

Gifts and hospitality may be offered and accepted in appropriate business contexts, provided they are reasonable in value, reflect customary business practice, and cannot reasonably be perceived as an attempt to improperly influence a business decision.

The following standards apply:

- Gifts or hospitality must never be offered, given or accepted with the intention of influencing a business decision or regulatory outcome, or in exchange for any form of preferential treatment;
- Cash or cash equivalents (including gift cards and vouchers) must never be given or accepted under any circumstances;
- Gifts or hospitality offered to, or received from, any public official require prior approval from Avi Shapira (Controller) regardless of value;
- All gifts and hospitality with an estimated value above $50 must be recorded in the Gifts and Hospitality Register (see Section 6.1) and require approval; and
- Any gift or hospitality that cannot be openly disclosed or that would embarrass the Company if made public must be refused.

Where uncertainty exists about whether a gift or item of hospitality is appropriate, the individual concerned should seek guidance from Marc Elmann before acting.

6.1 Gifts and Hospitality Register

All registerable gifts and hospitality must be recorded promptly in the Gifts and Hospitality Register.

Where a gift cannot reasonably be declined (e.g. where refusal would cause significant offence), it should be accepted, recorded immediately, and reported to Marc Elmann, who will determine whether it should be returned, donated to a charitable cause, or retained.

7. Facilitation Payments

Facilitation payments are prohibited under this Policy. No employee or agent may make a facilitation payment on behalf of the Company, even in locations where such payments may be customary or perceived as legally permissible.

If a person covered by this Policy is asked or pressured to make a facilitation payment, they should:

- Politely decline and make clear that the Company’s policy prohibits such payments;
- Note the details of the request, including the date, location, name and role of the requesting party (if known), and the amount or advantage requested; and
- Report the incident promptly to Marc Elmann.

Where a person covered by this Policy believes that their personal safety would be at risk if they refuse to make a facilitation payment, they should make the payment only if no alternative is reasonably available, and report it to Marc Elmann as soon as it is safe to do so.

The Company will keep records of any facilitation payments made and will seek to eliminate such payments over time.

8. Charitable Donations and Sponsorships

The Company supports charitable causes where appropriate. However, charitable donations, sponsorships and similar contributions must never be used as a substitute for a bribe or to improperly influence a business relationship.

All charitable donations, sponsorships and similar contributions must:

- Be approved in advance by Avi Shapira (Controller);
- Be made directly to a recognised charitable organisation, never to an individual; and
- Be documented and recorded.

9. Use of Agents and Third Parties

The Company may be held responsible for bribery carried out by agents and third parties acting on its behalf. Accordingly, the following measures apply:

- Due diligence on prospective agents and high-risk third parties will be carried out before engagement;
- All agents and relevant third parties must be made aware of this Policy and required to comply with equivalent anti-bribery standards as a condition of engagement; and
- Third-party relationships will be reviewed periodically to assess ongoing compliance.

10. Bribery Risk Assessment and Training

The Company will maintain a documented bribery risk assessment covering all relevant parts of the business. The risk assessment will:

- Identify functions, roles and transactions that carry a heightened risk of involvement in bribery (for example, procurement, sales, customs and licensing activities);
- Take account of geographical and industry-sector risk factors; and
- Be reviewed at least annually or whenever there is a material change to the business.

Based on the risk assessment, the Company will provide targeted training on this Policy and on anti-bribery good practice to all relevant employees, agents and contractors. Training will be documented and records retained.

11. Reporting Concerns

Anyone covered by this Policy who has a concern or suspicion about bribery or corruption — whether involving a colleague, agent, customer, supplier or any other party — should report it promptly to:

Contact	Details
Marc Elmann	marc@fremada.com

Reports may also be made anonymously where the Company's whistleblowing arrangements permit. The Company will not penalise anyone for making a good-faith report, even if the concern turns out to be unfounded.

Records of all concerns raised and the actions taken will be maintained confidentially.

12. Investigation and Sanctions

All actual or suspected cases of bribery will be investigated promptly and impartially by Marc Elmann or a designated alternative. Investigations will be documented and findings recorded.

Anyone found to be in breach of this Policy may face disciplinary action up to and including termination of employment or contract. Where bribery or corruption is confirmed or reasonably suspected, the Company may also refer the matter to the relevant authorities.

The Company will also take appropriate steps in relation to any agents or third parties found to be in breach of equivalent anti-bribery commitments.

13. Record-Keeping and Monitoring

The Company will maintain accurate and complete records of all matters relevant to this Policy, including:

- The Gifts and Hospitality Register;
- Records of training completion;
- Bribery risk assessments;
- Records of concerns raised and investigated; and
- Any facilitation payments made.

14. Policy Review

This Policy will be reviewed at least once per year to ensure it remains current, effective and consistent with applicable legal and regulatory developments. Revised versions will be communicated to all relevant personnel and made publicly available in accordance with COP 11.

15. Policy Endorsement

This policy and procedure has been approved by:

Name: Avi Shapira Position: Controller Date: November 11, 2026

Fremada Gold, Inc

Health & Safety Policy

Policy — Health & Safety

Document Control

Version	Date	Approved by
1.0	November 11, 2026	Avi Shapira (Controller)

1. Policy Statement

Fremada Gold, Inc. (hereinafter referred to as “the Company”) is committed to protecting the health, safety, and wellbeing of all employees, contractors, visitors, and any other persons who may be affected by its activities. The Company recognises that effective health and safety management is fundamental to responsible business conduct and to maintaining a safe working environment for everyone.

The Company will comply with all applicable health and safety legislation, regulations, and codes of practice in every jurisdiction in which it operates. Where local legal requirements set a lower standard than the principles in this policy, the Company will apply the higher standard.

The Company’s senior leadership takes ultimate responsibility for health and safety performance. Day-to-day implementation and monitoring of this policy is the responsibility of Marc Elmann.

2. Scope

This policy applies to:

- All employees, whether full-time, part-time, temporary, or on fixed-term contracts;
- All contractors, agency workers, and self-employed persons working on the Company’s premises or on its behalf;
- Visitors, clients, and members of the public who access the Company’s premises.

The policy covers all sites, facilities, and activities under the Company’s control. Where the Company operates across multiple sites, this policy applies to each site individually, with site-specific risk assessments maintained separately.

3. Responsibilities

3.1 Company responsibilities

The Company will:

- Provide and maintain safe premises, equipment, and systems of work;
- Ensure the safe handling, storage, and use of materials and substances;
- Provide adequate information, instruction, training, and supervision;

- Maintain appropriate welfare facilities;
- Consult with employees on matters affecting their health and safety;
- Conduct regular risk assessments and implement appropriate control measures;
- Investigate accidents, incidents, and near-misses, and take corrective action;
- Review this policy at least annually, or following any significant change to the Company's activities, premises, or applicable legal requirements.

3.2 Employee responsibilities

All employees are required to:

- Take reasonable care for their own health and safety and that of others who may be affected by their actions or omissions;
- Follow all health and safety instructions, procedures, and training provided by the Company;
- Where applicable, use equipment, personal protective equipment (PPE), and safety devices correctly and as directed;
- Report all accidents, incidents, near-misses, hazards, and unsafe conditions to Marc Elmann promptly;
- Refrain from intentionally misusing or interfering with anything provided in the interests of health and safety.

3.3 Contractors and visitors

All contractors working on Company premises are required to comply with this policy and any site-specific health and safety rules. Before commencing work, contractors must be informed of relevant hazards, emergency procedures, and any permit-to-work requirements applicable to their activities.

Visitors to Company premises must be accompanied by a member of staff unless otherwise agreed in advance. All visitors must be made aware of emergency exit routes and evacuation procedures upon arrival.

4. General Health & Safety Commitments

4.1 Risk assessment

The Company will conduct and document risk assessments for all significant hazards associated with its activities and premises. Risk assessments will be reviewed whenever there is a material change to working practices, premises, or personnel, and at least annually. Where risk assessments identify the need for control measures, these will be implemented and monitored by Marc Elmann.

4.2 Emergency preparedness

The Company will maintain documented emergency procedures covering, as a minimum:

- Fire evacuation — including designated assembly points, evacuation routes, and named fire wardens;

- First aid — including the location of first aid kits, the identity of trained first aiders, and procedures for calling emergency services;
- Incident reporting — including procedures for reporting accidents and dangerous occurrences to the relevant regulatory authority where legally required.

Emergency procedures will be communicated to all staff, tested periodically through drills, and reviewed following any activation or significant change.

4.3 Training and competence

The Company will ensure that all employees receive appropriate health and safety induction training before commencing work, and role-specific training where required. Where identified risks require specialist competence, only suitably qualified or trained individuals will undertake the relevant tasks.

4.4 Accident and incident reporting

All accidents, injuries, near-misses, and dangerous occurrences must be recorded in the Company's accident log. Marc Elmann is responsible for investigating incidents to identify root causes and implement corrective actions. Serious incidents will be reported to the relevant regulatory authority in accordance with applicable legal requirements.

All employees have both the right and responsibility to stop work or refuse to work in situations with uncontrolled hazards. Hazards should be immediately flagged to those at imminent risk and to management as soon as is reasonably possible.

4.5 Welfare facilities

The Company will provide and maintain adequate welfare facilities appropriate to the nature of its operations, including suitable toilet and washing facilities, drinking water, and appropriate rest areas.

4.6 Mental health and wellbeing

The Company recognises that mental health is as important as physical health and is committed to creating a working environment that supports the wellbeing of all employees. Stress, anxiety, and other mental health concerns will be treated with the same seriousness as physical health matters. Employees are encouraged to raise wellbeing concerns with Marc Elmann in confidence.

4.7 Lone working and remote working

Where employees work alone, whether on Company premises outside normal hours or at remote locations, the Company will take steps to manage the associated risks. This includes ensuring that lone workers are appropriately trained, that a means of communication is available, and that regular check-in arrangements are in place. Remote workers are expected to maintain a safe working environment at their place of work and to report any health and safety concerns to Marc Elmann.

Section A — Office Environment

A.1 Scope of this section

This section applies to all office-based activities carried out by the Company, including administrative, operational, and management functions. It covers office buildings and any ancillary areas such as reception areas, meeting rooms, kitchens, and common spaces.

A.2 Workstation and display screen equipment

The Company will ensure that workstations, including those using display screen equipment (DSE), are set up correctly and adjusted to suit individual users. Employees who experience discomfort associated with DSE use should report this to Marc Elmann.

A.3 Manual handling

Where manual handling tasks cannot be avoided, the Company will assess the associated risks and provide appropriate guidance and training. Employees should not attempt to lift or carry loads beyond their capability. Mechanical aids will be provided where practicable.

A.4 Slips, trips, and falls

The Company will maintain walkways, floors, and staircases in good condition and free from obstruction. Hazards such as trailing cables, wet floors, and damaged flooring will be addressed promptly. Adequate lighting will be maintained throughout the workplace.

A.5 Electrical safety

All electrical installations and portable electrical equipment used in the office will be maintained in a safe condition. Portable appliance testing (PAT) or equivalent checks will be conducted in accordance with applicable requirements. Employees must not use damaged or defective electrical equipment and must report any concerns to Marc Elmann.

A.6 Fire safety

The Company will:

- Carry out a fire risk assessment for all office premises and review it at least annually;
- Ensure that fire detection and suppression equipment is installed, tested, and maintained in accordance with applicable requirements;
- Maintain clear and unobstructed fire exit routes at all times;
- Display fire evacuation notices prominently;
- Conduct fire evacuation drills at appropriate intervals.

A.7 Indoor environment

The Company will ensure that office spaces are adequately ventilated, heated or cooled to a comfortable working temperature, and suitably lit. Where identified, actions to improve the indoor environment will be prioritised and assigned to Marc Elmann.

5. Policy Review and Communication

This policy will be reviewed at least annually by Marc Elmann and updated as necessary to reflect changes in the Company's operations, premises, personnel, or applicable legal requirements. The policy will also be reviewed following any significant accident, incident, or near-miss, or following any material change to the Company's activities.

This policy will be communicated to all employees upon commencement of employment and whenever it is materially updated. A current version will be made available to all staff at all times. The Company will ensure that all employees understand their responsibilities under this policy and have the opportunity to raise any health and safety concerns with Marc Elmann.

Fremada Gold, Inc.

Environmental Policy

Document Control

Version	Date	Approved by
1.0	November 11, 2026	Avi Shapira (Controller)

1. Policy Statement

Fremada Gold, Inc. (hereinafter referred to as “the Company”) is committed to conducting its business in a manner that minimises its impact on the natural environment. The Company recognises that its operations give rise to a range of environmental aspects, including energy and resource consumption, waste generation, and the potential for pollution, and is committed to managing these responsibly.

The Company will comply with all applicable environmental legislation, regulations, permit conditions, and other environmental obligations in every jurisdiction in which it operates. Where local legal requirements set a lower standard than the principles in this policy, the Company will apply the higher standard.

The Company’s senior leadership takes ultimate responsibility for environmental performance. Day-to-day implementation and monitoring of this policy is the responsibility of Marc Elmann.

2. Scope

This policy applies to:

- All operations, sites, and facilities under the Company’s control;
- All employees, contractors, and any other persons carrying out activities on the Company’s behalf;
- All significant environmental aspects associated with the Company’s activities, products, and services.

3. Responsibilities

3.1 Company responsibilities

The Company will:

- Identify and assess the significant environmental aspects and impacts of its activities;
- Establish and maintain appropriate objectives, targets, and controls to manage those aspects;
- Provide adequate resources, training, and supervision to achieve its environmental commitments;
- Monitor environmental performance and take corrective action where required;

- Consult with employees on environmental matters that affect their work;
- Review this policy at least annually, or following any significant change to the Company's activities, premises, or applicable legal requirements.

3.2 Employee responsibilities

All employees are required to:

- Follow all environmental procedures and instructions provided by the Company;
- Use resources, including energy, water, and materials, efficiently and avoid unnecessary waste;
- Segregate and dispose of waste correctly in accordance with the Company's procedures;
- Report any actual or potential environmental incidents, spills, or non-compliances to Marc Elmann promptly;
- Contribute to the Company's environmental objectives within the scope of their role.

3.3 Contractors

All contractors working on Company premises are required to comply with this policy and any site-specific environmental requirements. Before commencing work, contractors must be made aware of relevant environmental controls, waste management arrangements, and any applicable permit conditions.

4. General Environmental Commitments

4.1 Legal compliance and environmental permits

The Company will maintain an up-to-date understanding of its environmental legal obligations and, where required, hold and comply with the conditions of any environmental permits or consents applicable to its operations.

4.2 Environmental risk assessment

The Company will conduct and document environmental risk assessments for all significant aspects of its operations. Assessments will be reviewed whenever there is a material change to activities, processes, or premises, and at least annually. Where assessments identify the need for additional controls, these will be implemented and monitored.

4.3 Waste management

The Company will manage waste in accordance with the waste hierarchy: prevention, reuse, recycling, recovery, and disposal as a last resort. The Company will:

- Maintain a waste inventory identifying all waste streams generated across its operations;
- Ensure that waste is segregated, stored, and disposed of in accordance with applicable requirements;
- Use only licensed waste contractors for the collection and disposal of waste;

- Retain waste transfer documentation as required by applicable law.

4.4 Energy and resource use

The Company will take reasonable steps to monitor and reduce its consumption of energy and natural resources across all operations. This includes promoting energy-efficient practices, maintaining equipment in good working order, and considering environmental performance when procuring equipment and services.

4.5 Pollution prevention

The Company will implement appropriate controls to prevent pollution of air, water, and land. This includes the safe storage and handling of substances that have the potential to cause pollution, the maintenance of drainage and containment infrastructure, and ensuring that employees are trained in spill prevention and response procedures, where applicable.

4.6 Noise and light

The Company will take reasonable steps to ensure that noise and light generated by its operations do not cause unacceptable nuisance to neighbouring properties or adversely affect the surrounding environment. Where noise or light nuisance is identified as a risk, appropriate controls will be implemented.

4.7 Climate and biodiversity

The Company acknowledges the importance of reducing its contribution to climate change and protecting biodiversity. The Company will give appropriate consideration to its greenhouse gas emissions, including those arising from business travel and logistics, and to the potential impacts of its activities on biodiversity, and will seek to reduce adverse impacts where reasonably practicable.

4.8 Environmental incidents

All actual or potential environmental incidents, including spills, unauthorised discharges, or permit breaches, must be reported immediately. Marc Elmann is responsible for investigating incidents, implementing corrective actions, and reporting to the relevant regulatory authority where legally required.

4.9 Training and awareness

The Company will ensure that all employees receive appropriate training and information on the environmental aspects of their role and the Company's environmental procedures.

Section A — Office Environment

A.1 Scope of this section

This section applies to all office-based activities carried out by the Company, including administrative, operational, and management functions. It covers office buildings and any ancillary areas such as reception areas, meeting rooms, kitchens, and common spaces.

A.2 Energy consumption

The Company will promote energy-efficient practices in the office environment, including switching off lighting, computers, and other equipment when not in use, and optimising the

use of heating, cooling, and ventilation systems. Where practicable, the Company will seek to procure energy-efficient equipment and, where available, consider renewable energy sources.

A.3 Paper, print, and consumables

The Company will take steps to reduce paper consumption in the office, including promoting digital working practices and defaulting to double-sided and monochrome printing where printing is necessary. Printer cartridges, toner, and other office consumables will be disposed of through appropriate recycling or take-back schemes rather than as general waste.

A.4 Waste segregation and recycling

The Company will provide appropriate facilities for the segregation and recycling of office waste streams, including paper, cardboard, glass, plastic, and food waste where local collections permit. Electrical and electronic equipment (WEEE) will not be disposed of as general waste and will be managed through appropriate collection or take-back arrangements.

A.5 Water use

The Company will take reasonable steps to minimise unnecessary water consumption in office facilities, including by promptly reporting and repairing leaks and dripping fixtures.

A.6 Business travel and commuting

The Company will encourage employees to minimise the environmental impact of business travel, including through the use of video conferencing where practicable and the selection of lower-emission travel options where travel is necessary. Employees are encouraged to consider sustainable commuting options where these are available and practicable.

5. Policy Review and Communication

This policy will be reviewed at least annually and updated as necessary to reflect changes in the Company's operations, premises, personnel, or applicable legal requirements. The policy will also be reviewed following any significant environmental incident or material change to the Company's activities.

This policy will be communicated to all employees upon commencement of employment and whenever it is materially updated. A current version will be made available to all staff at all times. The Company will ensure that all employees understand their responsibilities under this policy and have the opportunity to raise any environmental concerns, which should be reported to Marc Elmann.