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.