MODERN SLAVERY & HUMAN RIGHTS STATEMENT

Last updated: November 2026

1. ABOUT THIS STATEMENT

This is a voluntary statement by Rathmar Trading, LLC, Rathmar Metals Ltd and Rathmar Metals A.Ş. (together, "Rathmar"). It sets out how we identify and address the risk of forced labour, child labour, human trafficking and other human-rights harms in our business and supply chains, in line with the UN Guiding Principles on Business and Human Rights and the ILO fundamental conventions. We review it every year.

2. OUR BUSINESS AND SUPPLY CHAINS

Rathmar trades crude oil, refined products, petrochemicals, chemicals, agricultural commodities, precious metals and minerals from offices in Houston, Zurich and Istanbul. Our supply chains run through producers, originators, miners, artisanal and small-scale producers, aggregators, refiners, vault operators, secure-transport providers, shipowners, terminal operators, inspection companies, road and rail hauliers, and customers in many countries.

3. WHERE THE RISK SITS

Risk concentrates in agricultural origination (child and forced labour in the harvest of cocoa, cotton, sugar cane and coffee); in artisanal and small-scale mining (child and forced labour, debt bondage and unsafe working conditions); at sea (crew abandonment, withheld wages and confiscated documents); in port, storage and road-transport labour; and in conflict-affected and high-risk areas, including mineral supply chains, where armed groups may control mine sites, routes, ports or checkpoints.

4. DUE DILIGENCE

Counterparty due diligence covers labour and human-rights controversies alongside sanctions and adverse media. Our Counterparty & Supplier Code is part of our contracts. For higher-risk origins we look for traceability to origin and recognized certification, and vessel vetting includes crew-welfare indicators such as Maritime Labour Convention certification. For mined material we trace chain of custody to the mine or point of export, keep assay and weight records, and apply enhanced diligence to artisanal and small-scale sources.

5. CONFLICT-AFFECTED AREAS

This section applies to mineral sourcing as well as to trading routes. Before sourcing minerals from a conflict-affected area, or trading in or into one, we assess whether the trade could benefit armed actors, be diverted, or displace local supply, and we document source, route, partner and payment choices. Payments to armed groups, including at mine sites and checkpoints, are prohibited. Where harm cannot be prevented or mitigated, we decline or suspend the trade.

6. REMEDIATION

Where we find that a counterparty is causing or contributing to abuse, we require a time-bound remediation plan and end the relationship if it is not met. Where Rathmar has caused or contributed to harm, we take part in remedy.

7. TRAINING

Traders, operators and compliance staff are trained to recognize forced-labour and trafficking indicators in counterparties, origins and logistics.

8. REPORTING

Concerns may be raised confidentially at speakup@rathmar.com — see Speak Up. Rathmar does not tolerate retaliation against anyone who raises a concern in good faith.

9. APPROVAL

This statement was approved by the Boards of Rathmar Trading, LLC, Rathmar Metals Ltd and Rathmar Metals A.Ş. in November 2026.