

2024 COMPLIANCE REPORT

PART A: REFINER'S DETAILS

Refiner's Name: Royal Canadian Mint

Location: Ottawa, Ontario, Canada

Reporting Year-End: December 31, 2024

Date of Report: March 31, 2025

Date of Audit Completion: March 31, 2025

Senior Management

Responsible for this Report:

A handwritten signature in blue ink, appearing to read 'Simon Kamel', is written over a horizontal line.

Simon Kamel,
Chief Anti-Money Laundering Officer and Compliance
Officer

PART B: SUMMARY OF ACTIVITIES UNDERTAKEN TO DEMONSTRATE COMPLIANCE

Step 1: Establish Strong Company Management Systems

We have fully complied with Step 1: Establish Strong Management Systems.

The Royal Canadian Mint (hereafter “the Mint”) has in place a corporate Responsible Metals Program and Anti-Money Laundering/Anti-Terrorist Financing and Know Your Customer (“KYC”) Program, which are consistent with the requirements set forth by the London Bullion Market Association’s (hereafter “LBMA”) *Responsible Gold Guidance (Version 9)* and *Responsible Silver Guidance (Version 2)*. As part of the requirements, the Mint has documented a Responsible Sourcing (Precious Metals) Policy (hereafter “the Policy”) that considers threat financing risks and environmental, social and governance (“ESG”) factors. The Mint has also established an internal management structure to support supply chain due diligence. This structure enables communication and implementation of program requirements, and monitoring of the supply chain due diligence program.

The Board of Directors of the Royal Canadian Mint (hereafter “the Board”) is responsible for the oversight of the Responsible Metals Program. An updated version of the Policy was enacted and approved by the Board on November 16, 2022 to incorporate the new requirements in the LBMA Responsible Gold Guidance version 9. Minor amendments to that policy were made in June 2024 and approved by the President and CEO. The Policy is reviewed by the Compliance Officer at least every three years, or more frequently as required, and is posted on Mint.ca [here](#). The Policy specifies the responsibilities of the Board with regard to its oversight role for the program and outlines the roles and responsibilities for the management of the program. All Board members completed online training of the Responsible Metals Program and Anti-Money Laundering training in 2024. The Board was briefed on the Responsible Metals Program in September 2024 and receives annual updates on the program, including the nature and number of high-risk suppliers as well as any risk mitigation strategies and the status of those strategies. The Board will also be advised if there are any zero-tolerance issues identified in the Mint’s precious metals supply chain.



The Chief Anti-Money Laundering Officer has been designated as the Compliance Officer for the Responsible Metals Program. The Compliance Officer is responsible for providing independent oversight and support of the day-to-day execution of the Responsible Metals Program activities by the Bullion and Refinery, Tax and Compliance, and Mint Office employees. The Compliance Officer has unfettered access to the Board, CEO and Senior Management and reports directly to the President and CEO of the Mint.

In the case of high-risk supply chains, the Compliance Officer must review the KYC and confer with the Chief Commercial Officer regarding the decision to pursue or maintain the relationship. Any zero-tolerance issues identified would be escalated immediately to the Compliance Officer, the CEO and to the Board as needed.

The Senior Manager, Compliance and the Director, Regulatory Affairs (Compliance) provide support to the Compliance Officer in fulfilling these obligations. In 2024 the Senior Manager, Compliance completed specialized LBMA training on responsible sourcing. The Compliance Officer has delegated responsibilities to the Senior Manager, Compliance and the Director, Regulatory Affairs (Compliance), who are responsible for managing the program and ensuring its implementation in order to identify and assess the risk related to all suppliers of gold or silver bearing refining deposits (hereafter “suppliers”). Where a material concern has been identified with respect to a supplier’s activity, it is to be communicated by Mint employees to either the Senior Manager, Compliance, the Director, Regulatory Affairs (Compliance), or the Compliance Officer. The Senior Manager, Compliance, the Director, Regulatory Affairs (Compliance), and the Compliance Officer ensure that the CEO, the Board, and appropriate internal stakeholders, where applicable, are also notified regarding said concern. The Mint has a Paralegal, Anti-bribery and Corruption who works directly with the Mint’s business lines to conduct KYC and on-board prospective customers.

The Mint has identified and recorded all suppliers and maintains records containing supply-chain information for each deposit. The Mint’s refinery has a gold and silver-bearing material receiving process, and requires that specific documents be received, and transactional details entered into the system, before processing the gold or silver-bearing material. The receiving process includes obtaining written and signed declarations from suppliers for deposits received, declaring that the material contained therein has been sourced responsibly in accordance with the most current version of the LBMA Responsible Gold Guidance and/or LBMA Responsible Silver Guidance (as applicable).

In all instances, existing supplier contracts contain a warranty that material received does not derive from criminal activity and is responsibly sourced. The Mint also maintains an updated supplier contract template for use when entering into an agreement with a new supplier for refining services, or when an existing agreement is being renewed. The updated supplier contract template specifically refers to the LBMA requirements that reflect OECD’s principles for responsible sourcing. This is supplementary to the warranty made by suppliers for their deposits. Included as part of the Policy, the Board has also approved a Customer Responsible Sourcing Policy (hereafter “Customer Policy”).



Starting in late 2022, suppliers were required to confirm compliance to the Mint's Customer Policy or their own, which is, at a minimum, consistent with Annex II of the *OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected or High-Risk Areas*.

The Senior Manager, Compliance and Director, Regulatory Affairs (Compliance) ensures responsibilities and information pertaining to the program are communicated to Senior Management, and to Mint employees who are responsible for the receiving and refining of deposits. They are supported by the Compliance team, the Bullion and Refinery team, and the refinery's Mint Office team.

A targeted training program is in place to inform these employees of their obligations under the Responsible Metals Program and must be completed annually for these employees active in their role at the time the training is deployed. The content of the training program is reviewed annually and updated as needed. An updated version of the fully bilingual online training Responsible Metals Program module was launched in August of 2024. The training was designed with a view to deliver training across a number of the Mint's business lines in support of the Responsible Metals Program. The training is considered to be mandatory for all employees to which it is assigned, however, this includes some employees who are not directly involved in the Responsible Metals Program at the Mint. Online training enables the Mint to maintain electronic training records, including the names of employees who completed the online training and respective dates of completion. Two hundred and thirty-four employees completed the training in 2024.

The Mint's refinery has communicated the Responsible Metals Program requirements to all suppliers and has engaged with them to ensure that materials received by the Mint for processing have been sourced responsibly, and not from illegal mining operations located in internationally designated conflict areas. Additionally, the Mint has engaged with suppliers to obtain written confirmations of their Anti-Money Laundering (AML), Anti-Terrorist Financing (ATF) and Conflict Free Sourcing (CFS) policies, where available. The Mint has also engaged with all high-risk suppliers by way of conducting site visits at the time that a new high-risk supplier is onboarded and will undertake site visits as needed on a risk-based basis including in the event a customer's risk rating changes to high risk for refining clients (site visits would not be done for a high risk trading customer) throughout the course of the business relationship due to new risks being identified or new regulatory or other (compliance) requirements. In the course of site visits, the Mint reviews and discusses the suppliers' AML/ATF/CFS policies and programs and confirms business details previously provided by the suppliers.

As part of a site visit to a high-risk gold and/or silver supplier (mine or recycler), the Mint will conduct sample due diligence over transactions or the supplier's transaction records to ensure that the origin of gold is traceable within the supply chain, and follow-up site visit(s) for high-risk supply chains will be carried out within a reasonable timeframe, and the frequency of those will depend on the number and severity of issues identified in respect of the supplier.



The Mint has a whistle-blowing program that includes confidential and anonymous reporting using a third-party provider.. This is an enhanced means to make anonymous disclosures relating to the Responsible Metals Program or related to other wrongdoing, without fear of reprisal. The whistle-blowing program can be accessed from the Mint's website [here](#). The Board receives quarterly updates on reports made through the whistleblowing service to ensure that appropriate action is being taken in regard to investigation and resolution of the allegations made.

The Mint received a number of reports from the whistle-blowing service in 2024 but none in relation to the Responsible Metals Program. For employees of the Mint, wrongdoing reporting can also be done directly to Human Resources, their manager, or under the statutory regime of *the Public Servant Disclosure Protection Act* ("PSDPA") either to the Mint's designated Senior Officer for Disclosures pursuant to PSDPA or to the Public Sector Integrity Commissioner of Canada.

The Mint does not accept any cash payments from its suppliers for refining services. Records for suppliers are maintained for a minimum of 5 years.

Step 2: Identify and Assess Risk in the Supply Chain

We have fully complied with Step 2: Identify and Assess Risk in the Supply Chain.

The Mint has identified and assessed the risks for each of its suppliers. Each supplier is required to undergo the Mint's KYC due diligence process and is subject to a risk assessment. The risk assessment encompasses risk indicators related to geography, nature of business, delivery channels, ownership, organizational structure, and other risk factors that the Mint deems relevant including consideration for ESG factors. All risk assessments are reviewed by the Senior Manager, Compliance and the Director, Regulatory Affairs (Compliance) before they are signed. In the event that a supplier's risk rating is determined to be high, the risk assessment is also reviewed and signed by the Compliance Officer. The Mint's due diligence for Politically Exposed Persons ("PEPs"), includes assessment of the region in which they operate (foreign or domestic) and the type of organization they represent (private, public or government).

Once onboarded, suppliers are required to undergo a reassessment of their KYC file. The cadence of reassessments depends on the risk rating the supplier is given. The Mint's policy is to reassess all low-risk suppliers every four years, moderate-risk suppliers every two years and high-risk suppliers annually. Where the Mint maintains a relationship with a high-risk supplier, the Mint will implement enhanced due diligence risk mitigation strategies and brief the Compliance Officer and the Chief Commercial Officer. The Mint did not onboard any new high-risk suppliers in the period, however the Mint updated and changed the risk rating for one supplier (a trading customer) from low to high in 2024 and therefore had four high-risk suppliers during the reporting period. The reason the supplier

was moved to high-risk was due to regulatory findings relating to anti money laundering controls. The three other suppliers have been classified as high-risk due to the fact that they have mixed materials. In early 2025, based on adverse media relating to environment controls from late December 2024, the Mint increased the rating of one supplier to high-risk.

In 2023, the Senior Manager, Compliance conducted site visits to the head office of two high risk suppliers, and in 2024 the Mint visited these suppliers' field locations in Dawson City, Yukon. Neither supplier refines their material as they only have the capability to melt. There were no other high-risk issues identified during the visits. The Mint suspended refining services to one mining client, Victoria Gold, after a significant environmental event in June 2024. The Mint advised the LBMA of the suspension in July 2024. The mine is question is no longer operating and is under bankruptcy protection and is under the control of a receiver. The Mint can confirm that there were no zero-tolerance issues with any of its suppliers throughout 2024.

The supplier due diligence process includes collecting and verifying the suppliers' business and financial details and ESG factors, verifying that the supplier and/or its beneficial owners are not on any economic, money laundering, or terrorist financing watch lists, sanctions list or listed as PEPs, and obtaining trade reference information. The Mint will assess whether PEPs pose a risk to the Mint and whether the identified risk can or cannot be mitigated. The Mint also requests copies of the suppliers' AML/ATF/CFS policies, as applicable. In November 2022, the Mint revised its supplier risk assessment tool to include new factors included in the LBMA Gold Guidance version 9 and a modified customer risk assessment tool was implemented in November 2022 for new suppliers and reassessments.

In the case of high-risk supply chains, in addition to assessing the suppliers, the Mint conducts a Know your Supplier (KYS) assessment of the third parties involved in the supply chain, namely the transportation companies used to transport the gold and silver-bearing material to the Mint. Furthermore, for those new high-risk suppliers who send the Mint material, the Mint performs a review of the suppliers' company details and site visits and conducts a country risk assessment if the material is coming from outside of Canada and the United States to determine the risk associated with receiving material from the international site. In addition, the Mint conducts appropriate scrutiny and monitoring of transactions undertaken through the course of the relationship for all suppliers rated high-risk. This is done by reviewing previous deposits at the time the customers KYC file is reassessed. Compliance will look for unusual spikes or dips in volume and in the event anything unusual is detected, they will reach out to the Sales Manager as well as the supplier to obtain more information for the unusual activity. The next course of action will depend on what information is uncovered.

For any identified High-Risk Intermediate Refiner, as defined in the LBMA Gold Guidance version 9, the Mint requires that such Refiners provide an independent audit report that aligns with an OECD responsible sourcing scheme. To fulfill this requirement, the Mint will recognize an audit report from either the Responsible Jewellery Council (RJC) or the



Responsible Minerals Initiative. To ensure commercial confidentiality, the Mint may choose to enter into Non-Disclosure Agreements with these suppliers to ensure that sensitive commercial information does not enter the public domain. The Mint has one Intermediate Refiner and the supplier has provided an independent assurance report.

All shipments of precious metals for refining that are received for processing are subject to inspection and validation that the material shipped conforms to the suppliers' previously established material type and amounts deposited are consistent for that customer. Mint Office employees verify that the required supporting documentation and written declarations have been received before the material is accepted for processing.

Should new information be made available about a given supplier at any time during the course of the business relationship that the Mint feels could change their risk rating, the Mint will review the possible impact to the supplier's risk assessment rating and re-assess the level of risk as required.

Step 3: Design and Implement a Management System to Respond to Identified Risks.

We have fully complied with Step 3: Design and Implement a Management System to Respond to Identified Risks.

The Mint has developed a response strategy to address identified risks. This strategy includes either (a) accepting the new supplier's application for services/continuing business with the existing supplier, as applicable, with treatment measures implemented to mitigate against the identified risk; or (b) suspending and/or terminating the new supplier's application, or suspending and/or terminating the relationship with the existing supplier, should the Mint deem that treatment measures would not sufficiently mitigate against the identified risk(s). The Mint has clearly documented the circumstances in which it adopted a zero-tolerance position and would immediately terminate the relationship with a given supplier.

The Mint did not disengage with any supplier of precious metals in 2024 due to non-conformance. The one supplier previously mentioned who was suspended is no longer operating and as such no remediation plan was implemented.

Where the Mint has identified a risk, and where the Mint deems that treatment measures would sufficiently mitigate the identified risk, appropriate risk mitigation strategies are implemented. Mitigation strategies may include (but are not limited to):

- (i) Obtaining further details concerning the supplier's operations and AML/ATF/CFS/ESG program controls.



- (ii) Obtaining information regarding scheduled future development plans for said programs and controls.
- (iii) Conducting a documented site visit of the supplier's facility to validate the supplier's activities.
- (iv) Adopting an improvement plan for the supplier, devised with their input and engagement, with performance objectives to be substantially fulfilled within a reasonable timeframe.
- (v) Scheduling a follow-up and re-assessment of the supplier's activities, where the Mint will then reassess its decision to continue maintaining its business relationship with the supplier based on the progress the supplier has demonstrated to date.

The Mint's Responsible Metals Program documentation specifies the minimum required for enhanced due diligence measures that must be taken where a high-risk supply chain has been identified, as well as triggers and frequency of reassessment.

Commitment to Continuous Improvement

The Mint has adopted a cloud-based software from aXedras AG. The project leverages a distributed ledger technology to enhance the transparency and tracking of the Precious Metals that make up the Mint's refinery outturn products. In 2024, the Mint launched Bullion Genesis, a distributed ledger technology powered by aXedras AG. For 2024, the Mint tracked material from source to finished product for special segregated gold products.

The compliance team works closely with the Mint's Impact office on ESG initiatives and priorities. The responsible sourcing of precious metals is discussed at the Mint ESG forums.

As part of its culture of transparency and sustainability, the Mint publicly reports on its ESG program and targets in its annual Impact Report ([here](#)).

Step 4: Arrange for an Independent Third-Party Audit of the Supply Chain Due Diligence.

We have fully complied with Step 4: Arrange for an Independent Third-Party Audit of the Supply Chain Due Diligence.



The Mint engaged independent service provider Ernst & Young LLP (“EY”) to perform a ‘limited assurance engagement’, as defined by International Standards on Assurance Engagements.

The Board has approved the appointment of EY as an auditor for the 2024 limited assurance engagement. EY’s independent practitioner’s assurance report is attached to this report.

Step 5: Report on Supply Chain Due Diligence

Royal Canadian Mint has fully complied with Step 5: Report on Supply Chain Due Diligence.

This compliance report has been prepared in accordance with Step 5. Further information pertaining to how the Mint’s gold and silver supply chain due diligence policies and practices align with the requirements of the *LBMA Responsible Gold Guidance (version 9)* and *Responsible Silver Guidance (Version 2)* has been detailed on the Mint’s website [here](#). A public-facing version of this report will also be made available on the website.

PART C: MANAGEMENT CONCLUSION

The Royal Canadian Mint is in compliance with the requirements of the *LBMA Responsible Gold Guidance (version 9)* and *Responsible Silver Guidance (Version 2)* as of December 31, 2024.

In conclusion, as of December 31, 2024, the Mint’s refinery has in place policies, management systems, procedures, processes and practices consistent with the requirements set forth in the *LBMA Responsible Gold Guidance (version 9)* and *Responsible Silver Guidance (Version 2)*.

The Mint is committed to ensuring it meets its social responsibilities and regulatory requirements and will continue to review and update its internal controls on an ongoing basis. This includes continuing the implementation of ongoing program improvement initiatives and industry best practices in 2025.

PART D: OTHER REPORT COMMENTS



If users of this report wish to provide any feedback to the Mint with respect to this report, they can contact the Compliance Officer at kamel@mint.ca, the Director of Regulatory Affairs (Compliance) at kniewasser@mint.ca, or the Senior Manager, Compliance at: boras@mint.ca

ANNEX A – ASSURANCE STATEMENT



Independent practitioner's assurance report

To the Management of the Royal Canadian Mint

Scope

We have been engaged by the Royal Canadian Mint (the "Mint") to perform a 'limited assurance engagement', as defined by International Standards on Assurance Engagements, hereafter referred to as the engagement, to report on the Mint's Compliance Report (the "Subject Matter") for the year ended December 31, 2024.

Criteria applied by the Mint

In preparing the Subject Matter, the Mint applied the guidance contained within the London Bullion Market Association's ("LBMA") Responsible Gold Guidance (version 9) and Responsible Silver Guidance (version 2) (collectively the "Criteria").

The Mint's responsibilities

The Mint's management is responsible for selecting the Criteria, and for presenting the Subject Matter in accordance with that Criteria, in all material respects. This responsibility includes establishing and maintaining internal controls, maintaining adequate records and making estimates that are relevant to the preparation of the Subject Matter, such that it is free from material misstatement, whether due to fraud or error.

EY's responsibilities

Our responsibility is to express a conclusion on the presentation of the Subject Matter based on the evidence we have obtained.

We conducted our engagement in accordance with the *International Standard on Assurance Engagements Other Than Audits or Reviews of Historical Financial Information* ("ISAE 3000"). This standard requires that we plan and perform our engagement to obtain limited assurance about whether, in all material respects, the Subject Matter is presented in accordance with the Criteria, and to issue a report. The nature, timing, and extent of the procedures selected depend on our judgment, including an assessment of the risk of material misstatement, whether due to fraud or error.

We believe that the evidence obtained is sufficient and appropriate to provide a basis for our limited assurance conclusion.

Our independence and quality management

We have complied with the relevant rules of professional conduct / code of ethics applicable to the practice of public accounting and related to assurance engagements, issued by various professional accounting bodies, which are founded on fundamental principles of integrity, objectivity, professional competence and due care, confidentiality and professional behaviour.

Our firm applies Canadian Standard on Quality Management 1, *Quality Management for Firms that Perform Audits or Reviews of Financial Statements, or Other Assurance or Related Services Engagements*, which requires us to design, implement and operate a system of quality management including policies or procedures regarding compliance with ethical requirements, professional standards and applicable legal and regulatory requirements.

Description of procedures performed

Procedures performed in a limited assurance engagement vary in nature and timing from, and are less in extent, than for a reasonable assurance engagement. Consequently, the level of assurance obtained in a limited assurance engagement is substantially lower than the assurance that would have been obtained had a reasonable assurance engagement been performed. Our procedures were designed to obtain a limited level of assurance on which to base our conclusion and do not provide all the evidence that would be required to provide a reasonable level of assurance.

Although we considered the effectiveness of management's internal controls when determining the nature and extent of our procedures, our assurance engagement was not designed to provide assurance on internal controls. Our procedures did not include testing controls or performing procedures relating to checking aggregation or calculation of data within IT systems.

A limited assurance engagement consists of making inquiries, primarily of persons responsible for preparing the Subject Matter and related information, and applying analytical and other appropriate procedures.

Our procedures included:

- ▶ Conducting interviews with relevant personnel to obtain an understanding of the policies, processes and internal controls relevant to the Subject Matter;
- ▶ Inspecting relevant documentation to support the implementation of policies, processes and internal controls as disclosed in the Subject Matter for conformity with the Criteria; and
- ▶ Checking that the information disclosed in the Subject Matter fairly describes the Mint's policies, processes and internal controls relevant to the Subject Matter.

We also performed such other procedures as we considered necessary in the circumstances.



Inherent limitations

Non-financial information, such as the Subject Matter, is subject to more inherent limitations than financial information, given the more qualitative characteristics of the Subject Matter and the methods used for determining such information. The methods used by refiners to comply with the Criteria may differ.

Conclusion

Based on our procedures and the evidence obtained, nothing has come to our attention that causes us to believe that the Subject Matter for the year ended December 31, 2024, is not prepared, in all material respects, in accordance with the Criteria.

A handwritten signature in black ink that reads 'Ernst & Young LLP'. The signature is written in a cursive, flowing style.

Chartered Professional Accountants
Licensed Public Accountants

March 31, 2025
Toronto, Canada