



MARTINEAU

*L'objet porteur de sens*

## KYC POLICY

As part of its commitment to ethical, social, and environmental responsibility and in the context of its involvement as a member of the RJC, which requires, among other things, due diligence for responsible supply chains of minerals from conflict-affected or high-risk areas, **MARTINEAU** has established the "KYC" (Know Your Counterparty) policy and the procedures described below, which apply to relevant Counterparties (CP).

This policy and associated procedures will be reviewed annually, and regular training will be provided by the Company's RJC coordinator. Accordingly, for each CP, and to the extent reasonably and legitimately permitted by us, we will:

1. Establish the identity of the counterparty and, when risk analysis recommends it or applicable legislation requires, their ultimate owners and beneficiaries, if applicable.
2. Verify that the counterparty and its ultimate owner, if applicable, do not appear on any applicable government list of individuals or organizations involved in money laundering and fraud activities or participating in illicit organizations and/or financing conflicts.
  - European Union Sanctions List:  
<https://data.europa.eu/euodp/en/data/dataset/consolidated-list-of-persons-groups-and-entities-subject-to-eu-financial-sanctions>
  - OFAC (Office of Foreign Assets Control) List:  
<https://sanctionssearch.ofac.treas.gov/>
3. Ensure that the nature of their activities, their financing, and the sources of materials are known.
4. Monitor transactions related to unusual or suspicious activities and report suspicious transactions to the relevant authorities.
5. Maintain records for at least five years or for the duration defined in national legislation (if longer) as required.

Saumur, April 14<sup>th</sup>, 2023

Jean QUENTIN  
CEO

Charlotte QUENTIN  
Sales Manager

Pierre QUENTIN  
Production Manager



