

## Modern Slavery and Human Trafficking Report

*Effective Date: January 1, 2024.*

### Introduction

This Report has been prepared by Goldmoney Inc. (“Goldmoney,” or the “Corporation” or “our” or “we”) for the financial year ending March 31, 2024 (the “Reporting Period”), in response to the reporting requirements under Canada’s Fighting Against Forced Labour and Child Labour in Supply Chains Act (the “Act”).

### Our Structure, Activities, and Supply Chain

#### Structure & Activities

Goldmoney is a TSX-listed company that focuses on the investment and custody of enduring real assets. Through its various subsidiaries, the Company is engaged in precious metals trading with its clients, including arranging for the custody and storage of precious metals for its clients. Goldmoney also maintains diversified interests in property investment. The Corporation’s operations are conducted through two wholly-owned business segments:

#### Goldmoney.com

Founded in 2001, Goldmoney.com is an online platform that provides clients with a secure platform to purchase, sell, and store precious metal bullion. Goldmoney stores precious metals physically in our global network of non-bank vaults. Clients manage their metals through Goldmoney Holding, which is available at Goldmoney.com. Goldmoney.com clients located in over 100 countries hold over \$2.4 billion in precious metal and fiat currency assets.

#### Goldmoney Properties

Goldmoney Properties Limited is a UK-based entity established to acquire long-life property assets with inflation-protected cash flows. As of March 31, 2024, Goldmoney Properties owns four properties totaling 416,319 sq. ft. (GIA) with an annual contracted net rental income of £6.6 million (\$11.2 million) and a combined remaining average lease term of 14 years.

#### Our Supply Chain

As an importer of precious metals into Canada, Goldmoney recognizes that there exists a risk that forced and/or child labour could be used somewhere in its precious metals supply chain. We believe, however, that this risk is greatly reduced by having all precious metals held for customers by Goldmoney meet the London Good Delivery standard established by the London Bullion Market Association for gold and silver bars and the London Platinum and Palladium

Market for platinum and palladium bars. These standards, which form the basis of the LBMA Responsible Sourcing Programme and must be adopted by all refiners included in the LBMA Good Delivery List, include due diligence requirements that prohibit forced and child labour, along with other human rights abuses.

Each bar is marked with the following stamps; these unique identifiers allow us to independently verify that the metal we receive LBMA Good Delivery bars:

- Fineness
- Year of production
- Serial number
- Assay stamp of refiner

Goldmoney also maintains a dedicated Compliance Department that oversees and manages all aspects of its business related to human rights. It ensures that management and employees receive the necessary information, education, and training to comply with applicable laws, rules, and regulations. They are aware of and perform reasonable due diligence investigations on the potential risks of dealing with potential and current business partners. Such applicable laws, rules, and regulations include the prohibition in Goldmoney's primary jurisdictions of child and forced labour.

## Our Consultation and Governance Process

We require that our people and business partners comply with our policies and standards. Our Corporate Governance Manual sets the expectations of behaviour for Goldmoney's employees, consultants, and business partners working with us or on our behalf.

### Code of Business Conduct & Ethics

This Code of Business Conduct & Ethics (the "Code") has been adopted by the board of directors of the Company. This Code embodies the commitment of the Company (and any subsidiaries) to conduct our business following all applicable laws, rules, regulations, and high ethical standards. The actions of the Company's employees, officers, and directors shall reflect honesty, integrity, and impartiality beyond doubt. We therefore consider the Code to include a prohibition on any use of or engagement with forced or child labour.

The Code applies to all members of the Goldmoney group, including the Board of Directors, management, and employees at every level, in every country, and from every Goldmoney legal entity (including joint ventures where Goldmoney has a majority/controlling interest).

### Whistle-Blower Policy

In addition to the Code, as it relates to this report, the Company maintains a whistle-blower policy to ensure that a confidential and anonymous process exists whereby persons can report any concerns relating to the Company, including any apprehension of forced or child labour or a risk thereof, without fear of reprisal.

Therefore, in addition to any applicable law and regulation, Goldmoney considers its internal policies appropriate and sufficient to minimize the risk of forced or child labour in its operations or supply chains, considering the nature, size, and jurisdictions of its business.

## Remedial Measures and Assessments Thereof

As Goldmoney has not to date detected any use of forced or child labour in its supply chains, it has not yet had to take any measures to remediate such illicit labour or to remediate any loss of income to the most vulnerable families resulting from the elimination of the same. Goldmoney will continue to assess its due diligence practices, internal policies, and legal and regulatory compliance in regard to forced and child labour annually as it prepares reports such as this. As described elsewhere in this report, Goldmoney remains alert to the issues of forced and child labour and will act swiftly to remediate the same should any be detected.

## Approval and Attestation

Following the requirements of the Act, and in particular subsection 11(4)(b)(2) thereof, I attest in my capacity as CEO of Goldmoney Inc. that I have reviewed the information contained in this report for and on behalf of Goldmoney Inc. and its subsidiaries. Based on my knowledge, and having exercised reasonable diligence, I attest on behalf of the Board of Directors of Goldmoney that the information in the report is true, accurate and complete in all material respects for the purposes of the Act for the reporting year listed above and that the Board of Directors of Goldmoney has approved this report.

/s/ Roy Sebag

Roy Sebag  
CEO  
Goldmoney Inc.