

Modern Slavery and Human Trafficking Report

Effective Date: April 1, 2026.

Introduction

This Report has been prepared by Goldmoney Inc. (“Goldmoney,” or the “Corporation” or “our” or “we”) for the financial year ending March 31, 2026 (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”).

This Report is intended to satisfy the disclosure obligations set out in section 11 of the Act and has been prepared with reference to the joint Canada–United Kingdom–Australia modern slavery reporting template and the updated guidance issued by Public Safety Canada ahead of the May 31, 2026 reporting deadline. It covers Goldmoney Inc. and the entities it controls, including Goldmoney's two wholly-owned business segments described below.

1. Identification of the Reporting Entity

Legal name of reporting entity	Goldmoney Inc.
Jurisdiction of incorporation	British Virgin Islands
Stock exchange listing	Toronto Stock Exchange (TSX)
Reporting period	Financial year ending March 31, 2026
Reporting category under the Act	Reporting entity under section 9 of the Act
Joint report	No – this Report is filed by Goldmoney Inc. on behalf of itself and its controlled entities

2. Our Structure, Activities, and Supply Chain

2.1 Structure and Activities

Goldmoney is a TSX-listed company that focuses on the investment and custody of enduring real assets. Through its various subsidiaries, the Corporation is engaged in precious metals trading with its clients, including arranging for the custody and storage of precious metals on

their behalf. 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 approximately \$5.0 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 long-term income streams as well as mixed-use assets.

2.2 Workforce

Goldmoney's employees are located primarily in Canada and the United Kingdom, with a smaller number engaged through subsidiaries supporting global vaulting operations. All employees are directly engaged by a Goldmoney group entity, are paid above applicable minimum wage thresholds, and have the right to leave their employment freely on notice. Goldmoney does not use employment recruiters in jurisdictions identified by independent indices as carrying elevated risk of forced or child labour.

2.3 Supply Chains

As an importer of precious metals into Canada, Goldmoney recognizes that there exists a risk that forced labour and/or child labour could be used somewhere in the upstream precious metals supply chain. We believe, however, that this risk is significantly reduced by the fact that all precious metals held for clients by Goldmoney meet the **London Good Delivery** standard established by the London Bullion Market Association ("LBMA") for gold and silver bars, and the equivalent standard maintained by the London Platinum and Palladium Market for platinum and palladium bars. These standards form the basis of the LBMA Responsible Sourcing Programme, which must be adopted by all refiners included in the LBMA Good Delivery List, and include due diligence requirements that prohibit forced labour, child labour, and other human rights abuses.

Each bar received by Goldmoney is marked with the following stamps, which serve as unique identifiers and allow us to independently verify that the metal received is an LBMA Good Delivery bar:

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

Beyond the precious metals supply chain, Goldmoney's procurement activity consists primarily of professional services (legal, accounting, audit, IT, insurance) and standard corporate goods (office equipment, software, secure communications). Procurement of these goods and services is concentrated in Canada, the United Kingdom, and other low-risk jurisdictions, and Goldmoney considers its dealings outside the precious metals supply chain to fall within what Public Safety Canada describes as "very minor dealings" relative to its overall operations.

3. Policies and Due Diligence Processes

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

3.1 Code of Business Conduct & Ethics

The Code of Business Conduct & Ethics (the "Code") has been adopted by the Board of Directors of the Corporation. The Code embodies the commitment of the Corporation (and its subsidiaries) to conduct business in accordance with all applicable laws, rules, and regulations, and consistent with high ethical standards. The actions of the Corporation's employees, officers, and directors must reflect honesty, integrity, and impartiality beyond doubt. We therefore consider the Code to include a prohibition on any use of, or engagement with, forced labour 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 across every Goldmoney legal entity (including joint ventures in which Goldmoney holds a majority or controlling interest).

3.2 Whistle-Blower Policy

In addition to the Code, the Corporation maintains a Whistle-Blower Policy to ensure that a confidential and anonymous process exists by which any person can report concerns relating to the Corporation – including any concern, suspicion, or risk of forced labour or child labour – without fear of reprisal. Reports may be made to the Audit Committee through the channels described in that policy.

3.3 Compliance Function

Goldmoney maintains a dedicated Compliance Department that oversees and manages all aspects of the business related to human rights. The Compliance Department ensures that management and employees receive appropriate information, education, and training to comply with applicable laws, rules, and regulations, and conducts reasonable due diligence in respect of potential and current business partners. Such applicable laws, rules, and regulations include the prohibition of child and forced labour in Goldmoney's primary operating jurisdictions.

3.4 Reliance on the LBMA Responsible Sourcing Programme

For the precious metals supply chain specifically, Goldmoney's primary due diligence mechanism is its restriction to refiners that are accredited under, and remain in good standing on, the LBMA Good Delivery List. The LBMA Responsible Sourcing Programme requires refiners to implement the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas, including controls designed to identify and address forced labour, child labour, and other human rights risks at the mine, transport, and refining stages. Refiners are subject to annual independent third-party audits and may be removed from the LBMA Good Delivery List for non-compliance.

4. Forced and Child Labour Risk in Our Activities and Supply Chains

4.1 Risk Assessment

Goldmoney has assessed the risk of forced labour and child labour across its activities and supply chains using a combination of (i) jurisdictional risk indicators (including the U.S. Department of Labor **List of Goods Produced by Child Labor or Forced Labor** and the **Global Slavery Index**), (ii) the nature of the goods and services procured, and (iii) the level of control or visibility we have over the relevant tier of the supply chain.

Based on this assessment:

- The **upstream precious metals supply chain** (mining and initial processing) is the area of Goldmoney's operations that carries the most material inherent risk of forced labour or child labour, particularly where artisanal and small-scale mining is involved. This risk is mitigated, but not eliminated, by sourcing exclusively from LBMA-accredited refiners.
- **Direct employment** within the Goldmoney group is assessed as low risk, given that staff are concentrated in Canada and the United Kingdom and engaged directly under formal employment terms.
- **Corporate procurement** outside of precious metals (professional services, standard office and IT goods) is concentrated in low-risk jurisdictions and represents a small share of Goldmoney's total spend. Goldmoney considers these dealings to be of a "very minor" character relative to its core business.

4.2 Steps Taken to Assess and Manage Risk

During the Reporting Period, Goldmoney took the following steps to assess and manage the risk of forced labour and child labour in its activities and supply chains:

- Continued to restrict its precious metals holdings to bars produced by refiners on the LBMA Good Delivery List.

- Verified each bar received against its unique identifying marks (fineness, year of production, serial number, and assay stamp).
- Maintained the Code of Business Conduct & Ethics and Whistle-Blower Policy, and made the reporting channels available to all employees, contractors, and business partners.
- Reviewed the operation of the Compliance Department's due diligence procedures in respect of business partners.
- Monitored developments in modern slavery legislation, including Public Safety Canada's updated guidance under the Act, the U.K. **Modern Slavery Act 2015**, and the Australian **Modern Slavery Act 2018**, and reviewed Goldmoney's policies for continued alignment.

5. Remediation Measures

To date, Goldmoney has not identified any instances of forced labour or child labour in its activities or supply chains. As a result, Goldmoney has not been required to take measures to remediate forced labour or child labour during the Reporting Period.

If a credible concern were identified - whether through the Whistle-Blower Policy, supplier due diligence, an LBMA Responsible Sourcing audit finding, or any other channel - Goldmoney's response would be coordinated by the Compliance Department under the oversight of senior management and, where appropriate, the Board of Directors. The response would be designed to stop and remediate the harm, escalate to relevant authorities where required, and review and adjust supplier relationships and internal controls as appropriate.

6. Remediation of Loss of Income

Because no instances of forced labour or child labour have been identified in Goldmoney's activities or supply chains, Goldmoney has not taken measures during the Reporting Period to remediate loss of income to the most vulnerable families resulting from any measure to eliminate the use of forced labour or child labour. Goldmoney recognizes that, where remediation steps are required in the future, those steps should be designed to avoid causing or contributing to further harm to vulnerable workers and their families, and Goldmoney would consider that principle in the design of any such response.

7. Training

Goldmoney's employees receive periodic training on the Code of Business Conduct & Ethics and on the Corporation's compliance policies, including the Whistle-Blower Policy. This training reinforces the prohibition on forced labour and child labour in Goldmoney's operations and business relationships and the channels available for reporting concerns. Members of the Compliance Department additionally maintain awareness of developments in modern slavery legislation and supply chain due diligence standards relevant to the precious metals industry.

8. Assessing Effectiveness

Goldmoney assesses the effectiveness of its actions to prevent and reduce the risk of forced labour and child labour through:

- annual review of its Code of Business Conduct & Ethics, Whistle-Blower Policy, and related compliance procedures by the Compliance Department, with oversight by the Board of Directors;
- ongoing verification that all precious metals held for clients are produced by refiners listed on, and in good standing under, the LBMA Good Delivery List;
- monitoring of reports submitted through the Whistle-Blower Policy and other compliance channels;
- preparation of this Report, which provides an annual opportunity to review Goldmoney's structure, supply chains, policies, due diligence, training, and risk profile against the requirements of the Act and the updated guidance issued by Public Safety Canada.

Based on these activities during the Reporting Period, Goldmoney considers its existing internal policies and reliance on the LBMA Responsible Sourcing Programme to be appropriate and sufficient to minimize the risk of forced labour and child labour in its operations and supply chains, taking into account the nature, size, and jurisdictions of its business. Goldmoney remains alert to the issues of forced labour and child labour and will act promptly to remediate any such conduct that may be identified.

9. Approval and Attestation

This Report was approved by the Board of Directors of Goldmoney Inc. pursuant to subparagraph 11(4)(b)(ii) of the Act.

In accordance with the requirements of the Act, and in particular section 11 thereof, I attest that I have reviewed the information contained in this Report for and on behalf of Goldmoney Inc. and the entities it controls. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in this Report is true, accurate, and complete in all material respects for the purposes of the Act for the Reporting Period.

I make this attestation in my capacity as a director of Goldmoney Inc., and I have the authority to bind Goldmoney Inc.

/s/ Roy Sebag

Roy Sebag
Chief Executive Officer and Director
Goldmoney Inc.
Date: April 1, 2026