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Change Control				
Version	Date	Description of changes	Name	Status
1.0	16-01-2014	New Policy	G Magid	Generated
1.0	01-09-2016	Annual review	G Magid	Reviewed
1.1	26-07-2019	Annual review and added Provenance claim to the policy	T Pelser	Reviewed
2.0	30-04-2021	New template	T Pelser	Updated
2.0	23-11-2022	Annual review	C Kroezen	Reviewed
3.0	2025-06-13	Update and change to format	L Nel	Updated

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## **Complaints, Grievances and Concerns Policy in relation to Precious Metals Supply Chain and Provenance Claim**

### **1. Purpose**

- 1.1 Metal Concentrators SA (Pty) Ltd ("MetCon" or "the Company") is committed to providing all stakeholders with accessible, transparent, and confidential channels to raise grievances, complaints, or concerns regarding business conduct, ethical sourcing, and provenance claims across the precious metals supply chain.
- 1.2 This policy aligns with the MetCon Supply Chain Due Diligence Policy, the OECD Due Diligence Guidance for Responsible Supply Chains from Conflict-Affected and High-Risk Areas (CAHRAs), and the Responsible Jewellery Council's Code of Practices (RJC COP) and Chain-of-Custody (COC) standards.

### **2. Scope**

This policy applies to all internal and external stakeholders including employees, contractors, suppliers, partners, civil society groups, and affected communities who may raise concerns related to:

- Ethical sourcing
- Provenance claims
- Human rights and labour practices
- Anti-Money Laundering (AML) and Counter-Terrorist Financing (CTF)
- Bribery, corruption, or fraud
- Non-compliance with RJC standards or MetCon policies

### **3. Policy Statement**

MetCon will not obtain or process precious metals from suppliers or sources involved in:

- Conflict-Affected or High-Risk Areas (CAHRAs), including the DRC and adjoining countries
- Illegal or unethical practices
- Human rights violations or environmental abuse

All supply chain participants must align with MetCon's risk-based due diligence framework and sourcing requirements. Concerns or deviations must be reported immediately.

### **4. Grievance Mechanism**

#### 4.1 Reporting Channels

Grievances may be reported through any of the following confidential and secure methods:

- Email: [compliance@metcon.co.za](mailto:compliance@metcon.co.za)
- Written complaint submitted to the RJC Compliance Officer
- Telephone reporting to the RJC Compliance Officer

Reports may be submitted anonymously. All complaints will be handled in a confidential, non-retaliatory manner.

#### 4.2 Investigation and Resolution

- All reports will be logged in the Grievance Register, maintained by the RJC Compliance Officer.
- The complaint will be assessed and investigated by the Company's Executive Committee or designated investigator.
- Based on the investigation outcome, appropriate corrective or preventive measures will be taken.
- Updates and resolutions will be recorded in the Grievance Register and tracked for compliance.

### 5. **Commitment to Ethical Practices**

MetCon does not tolerate or facilitate:

- Child or forced labour
- Human rights abuses
- Bribery, extortion, or tax evasion
- Money laundering or terrorist financing
- Material linked to non-state armed groups

Engagement with suppliers involved in any of the above will be suspended or terminated immediately.

### 6. **Compliance and Monitoring**

- All grievance records will be audited annually.
- Effectiveness of the grievance mechanism will be reviewed periodically.
- Staff and suppliers will receive training on the use and importance of this policy.

### 7. **References**

- Supply Chain Due Diligence Policy
- MetCon Know Your Counterparty Policy and Procedure
- OECD Due Diligence Guidance
- RJC Code of Practices and Chain-of-Custody Standards