

	<b>Document number</b>	<b>Document issue</b>
	RAC-POL-001	2.0
<b>Document name</b>	Responsible Jewellery Council Compliance Policy	
<b>Document originator</b>	T Pelser	
<b>Document owner</b>	T Pelser	

Change Control				
Version	Date	Description of changes	Name	Status
1.0	2019-07-26	New Policy	T Pelser	Compiled
1.1	2021-04-30	New template	T Pelser	Updated
1.1	2022-11-21	Annual Review	C Kroezen	Reviewed
2.0	2026-01-21	RJC Transition to New Standards	Lasya Nel	Update

<b>Previous review date:</b>	2026-01-21	<b>Next review date:</b>	2027-01-21
<b>Reviewer</b>	Lasya Nel	<b>Date:</b>	2026-01-21
<b>Modifier</b>	Lasya Nel	<b>Date:</b>	2026-01-21
<b>Approver</b>	T Pelser	<b>Date:</b>	2026-01-21
<b>Upload</b>	✓	<b>Date</b>	2026-01-21
<b>Print</b>	✓	<b>Date</b>	2026-01-21
<b>Removed if obsolete</b>	✓	<b>Date</b>	2026-01-21

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## Responsible Jewellery Council Compliance Policy

### 1. Purpose and Commitment

Metal Concentrators SA (Pty) Ltd is one of the largest privately-owned refineries in South Africa with operations in Gauteng and the Western Cape. We refine and supply precious metal to South Africa and the global market. Our respect for the land, its people and our commitment to responsible, ethical and lawful business practices drive the delivery of high-quality products and the maintenance of a strong reputation for integrity and excellence.

Metal Concentrators SA (Pty) Ltd is a member of the Responsible Jewellery Council (RJC).

The RJC is a standard setting organisation established to advance responsible ethical, human rights, social and environmental practice throughout the gold, silver, platinum group metals, diamond and coloured gemstone jewellery supply chain. The RJC standards are supported by independent third-party auditing to provide assurance of responsible business conduct.

### 2. Overarching Responsible Business Policy

The RJC has developed a benchmark standard for the jewellery supply chain and credible mechanisms for verifying responsible business practices through third-party auditing.

As an RJC certified member, we commit to operating our business in full accordance with the RJC Code of Practices and Chain of Custody, including best practice requirements in the precious metal industry. We commit to integrating ethical, human rights, social and environmental considerations into our day-to-day operations, business planning activities and decision-making processes.

### 3. Governance, Accountability and Oversight

#### 3.1. Senior Management Responsibility

MetCon assigns authority and responsibility for compliance with all applicable RJC COP and COC requirements to the RJC Compliance Officer, a senior management position with appropriate authority, independence, and access to Executive Management.

The RJC Compliance Officer is responsible for:

- Overseeing the implementation and maintenance of COP

and COC management systems.

- Monitoring compliance and effectiveness.
- Coordinating internal reviews, audits, and corrective actions.
- Escalating material risks, incidents, and non-conformances to Executive Management.

### **3.2. Executive Oversight – CRRC**

Executive oversight of responsible business practices is provided through the **Compliance and Risk Review Committee (CRRC)**. The CRRC:

- Reviews COP- and COC-related risks, audit findings, incidents, and grievances.
- Overseas corrective and preventive actions.
- Monitors regulatory and standards developments; and
- Ensures alignment between COP, COC, AML/CFT, KYC/KYP, and supply chain due diligence frameworks.