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1.0	16-01-2014	New policy	G Magid	Generated
1.0	01-07-2016	Annual review	G Magid	Reviewed
1.0	01-09-2016	Annual review	G Magid	Reviewed
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1.1	23-10-2020	Added International Legal Tender coins	T Pelser	Updated
2.0	30-04-2021	New template	T Pelser	Updated
2.0	23-11-2022	Annual review	C Kroezen	Reviewed
2.1	2025-06-12	Updated policy and inclusion of AML/CTF AML/CTF compliance	L Nel	Updated
2.2	2025-11-10	Updated RMI updates section 3 and 4 and 8.	T Pelser	Updated
2.3	2026-01-21	Update of RJC New Standards Audit	L Nel	Update

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# Supply Chain Due Diligence Policy and Declaration

## 1. Purpose

Metal Concentrators SA (Pty) Ltd ("MetCon") is committed to sourcing precious metals in a responsible, transparent, and ethical manner. This policy formalizes our adherence to the OECD Due Diligence Guidance for responsible supply chains from Conflict-Affected and High-Risk Areas (CAHRAs) and aligns with the standards of the Responsible Jewellery Council (RJC) and the Responsible Minerals Initiative (RMI). It also ensures compliance with Anti-Money Laundering (AML) and Counter-Terrorist Financing (CFT) regulations.

## 2. Scope

This policy applies to all internal and external parties involved in the procurement, handling, processing, trading, and refining of precious metals by MetCon. This includes employees, contractors, suppliers, and partners.

## 3. Policy Statement

Since its establishment in 1990, MetCon has demonstrated leadership in ethical business practices within the South African precious metals industry. This policy reflects our continued commitment to integrity, transparency, and compliance with international best practices in responsible sourcing.

MetCon's supply chain due diligence applies to the following conflict minerals (gold, and any other precious or associated minerals) in accordance with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (CAHRAs) and the Responsible Minerals Assurance Process (RMAP).

MetCon applies CAHRA assessment to all material types, including recycled, scrap, and mixed sources, especially where the refining country is known or suspected to be a transit or aggregation hub for high-risk gold.

The Company commits to implementing all five OECD steps, including Step 3 – risk management and mitigation, to identify, prevent, and address adverse impacts in its supply chain.

Risks identified include, but are not limited to:

- Human rights abuses and forced or child labour
- Money laundering, terrorist financing, bribery, and corruption
- Non-payment or misrepresentation of taxes, fees, and royalties due to government
- Contribution to conflict through direct or indirect support of non-state armed groups or public/private security forces.

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We commit to purchasing only from legitimate and ethical sources, and to ensuring that no precious metals processed or traded by MetCon are associated with:

- Corruption or fraud
- Armed conflict or terrorist financing
- Tax evasion or misrepresentation
- Money laundering
- Human rights abuse

#### 4. Principles of Commitment

The Shareholders, Management, and Staff of MetCon are fully committed to the following principles:

- We will not tolerate, support, facilitate, contribute to, or benefit from any activities that involve, directly or indirectly:
  - Child labour or any form of forced labour, bonded, or compulsory labour.
  - Human rights abuses, including violations of internationally recognised human rights; Torture, cruel, inhuman, or degrading treatment or punishment.
  - War crimes, crimes against humanity, or genocide
- We will cease engagement with any supplier linked to the above abuses.
- We will not engage with suppliers who:
  - Support or finance non-state armed groups
  - Control mine sites or trade routes illegally
  - Extort, tax, or exploit artisanal or industrial miners
- We will not purchase, trade, or process Krugerrands or any local/international legal tender coins.
- We will not trade with or accept material from any supplier involved in the melting or reprocessing of legal tender coins.
- We will immediately suspend any supplier:
  - Identified as high-risk due to support for armed groups
  - Implicated in illegal or suspicious transactions in the supply chain
- We will not support any public or private security forces that commit abuses or engage in extortion.
- We will not offer or accept bribes or engage in conduct that conceals the origin of precious metals.
- We are committed to combating money laundering and terrorist financing connected to any point of the supply chain.
- We will continuously monitor and mitigate identified supply chain risks in alignment with OECD Step 3.
- We will suspend or terminate relationships with any supplier that fails to address such risks, including those relating to non-payment of taxes, fees, or royalties.
- Maintain documented evidence of mitigation and corrective action efforts.

## 5. Principles of Commitment

To implement this policy effectively, MetCon has:

- Appointed an RJC Compliance Officer to oversee all supply chain due diligence activities
- Adopted a comprehensive risk-based due diligence process in line with OECD recommendations
- Integrated KYC, risk screening, and source verification for all suppliers
- Maintained a system of Grievance Registers, audit trails, and compliance logs

Where business partners do not have formal policies, MetCon may provide assistance in aligning them with this policy.

## 6. AML/CFT Compliance

MetCon confirms that its due diligence process integrates the detection and mitigation of AML and CFT risks. This includes the identification and reporting of suspicious transactions and the prevention of illicit material entering the supply chain.

## 7. Grievance Mechanism

MetCon provides an open, secure, and confidential process for stakeholders to raise concerns regarding the supply chain, sourcing practices, or provenance claims.

Concerns may be reported via:

- Email: [compliance@metcon.co.za](mailto:compliance@metcon.co.za)

All grievances will be recorded in the Grievance Register and addressed in accordance with the Company's Complaints, Grievances and Concerns Policy.

## 8. Declaration of Compliance

All suppliers are required to:

- Acknowledge receipt and understanding of this policy
- Commit to its principles and practices
- Sign a formal Supply Chain Due Diligence Declaration
- The Supplier undertakes to conduct mineral supply chain due diligence consistent with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas, including Annex II expectations. The Supplier agrees to identify and manage red flags in its own supply chain, maintain appropriate documentation, and provide MetCon with relevant due-diligence information upon request.

Where needed, MetCon will provide support to assist suppliers in aligning with our standards.

**9. Consequences for Non-Compliance:**

Suppliers who fail to meet MetCon's responsible sourcing and due diligence expectations may be subject to corrective action, temporary suspension of transactions, placement of material on hold, enhanced due diligence requirements, refusal of material, or termination of the business relationship in cases of serious or repeated non-compliance.

*T Pelsler*

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Signature

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29/01/2026

Date

T Pelsler

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Name (Duly Authorised)

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Compliance Director

Position