RBM MINERAL RESOURCES CC

A MEMBER OF THE RBM GROUP · SOUTH AFRICA | UAE

FINANCIAL CRIME COMPLIANCE

Anti-Bribery and Corruption Policy

Prevention, detection and response to bribery and corruption

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1. Purpose and scope

This Policy sets out how RBM Mineral Resources CC, a member of the RBM Group (the **"Company"**), prevents, detects and responds to bribery and corruption. It is issued having regard to the Prevention and Combating of Corrupt Activities Act 12 of 2004, and to the extra-territorial reach of the United Kingdom Bribery Act 2010 and the United States Foreign Corrupt Practices Act, either of which may apply to the Company's international dealings.

It applies to every member, officer, employee, contractor, consultant, agent and intermediary acting for or on behalf of the Company, in South Africa, the United Arab Emirates and anywhere else the Company operates.

2. What is prohibited

It is prohibited to offer, promise, give, request, agree to receive or accept any financial or other advantage where the purpose or likely effect is to induce or reward the improper performance of a function or activity. This applies whether the other party is a public official or a private person, whether the advantage passes directly or through a third party, and whether it is offered before or after the act concerned.

Specifically prohibited:

- **Bribes** in any form, including cash, cash equivalents, goods, services, employment, discounts, favours and the assumption of a debt.
- **Facilitation payments** — small unofficial payments to secure or speed up a routine action to which the Company is already entitled. These are prohibited without exception, even where they are customary locally.
- **Kickbacks** — the return of a portion of a payment as a reward for awarding or retaining business.
- **Improper political and charitable payments** — donations used, or likely to be perceived as being used, to obtain a business advantage.
- **Indirect bribery** — engaging or paying an agent, consultant or intermediary in circumstances where the Company knows, or ought reasonably to know, that all or part of the payment will be used improperly.

3. Safety payments

Nothing in this Policy requires any person to place their own safety at risk. Where a payment is demanded under threat of harm to life or limb, the person may make it. The payment must be reported to the Compliance Officer at the earliest safe opportunity and recorded accurately in the Company's books. It will not be treated as a breach of this Policy.

4. Gifts and hospitality

Gifts and hospitality are permitted only where all of the following are true: the purpose is genuinely to build a business relationship; the value is modest and proportionate; the timing is unconnected to a pending decision, tender or negotiation; it is given openly and could be disclosed without embarrassment; and it is permitted by the recipient's own organisation.

Threshold	Requirement
Under R1 000 per occasion	Permitted without prior approval. Still subject to the tests above.
R1 000 to R5 000	Prior written approval of the Compliance Officer, and entry in the gifts and hospitality register.
Above R5 000	Prior written approval of the Managing Member and the Compliance Officer, and entry in the register.
Any public official	Prior written approval of the Compliance Officer regardless of value, and entry in the register.
Cash or cash equivalent	Prohibited in all circumstances, at any value.

The Compliance Officer maintains the gifts and hospitality register and reviews it at least quarterly for patterns.

5. Third parties and intermediaries

The Company is exposed to the conduct of those who act for it. Before appointing an agent, consultant, broker or introducer, the Company will conduct proportionate due diligence covering ownership and control, relevant experience, connections to public officials, adverse media, and the commercial rationale for the appointment and the fee.

Every such appointment must be in writing, must record services actually to be rendered and a fee proportionate to them, must include anti-bribery undertakings and audit and termination rights, and must prohibit sub-delegation without consent. Payment is made to the contracting party, in its own name, in its country of operation, against an invoice describing the services rendered. Cash payments and payments to third-party accounts are prohibited.

6. Political and charitable contributions

The Company makes no political donations. Charitable donations are made only through the Company's corporate social responsibility programme, only to a verified organisation, never in cash, never at the request or suggestion of a person in a position to award business, and always recorded.

7. Books, records and controls

Every payment must be supported by an accurate description in the Company's books. No account, fund or asset may be kept off the record for any purpose. Attempts to disguise a payment through a false invoice, an inflated cost, an unrecorded discount or a mischaracterised expense are treated as bribery.

8. Reporting and investigation

Any suspected breach must be reported immediately to the Compliance Officer or in confidence to **compliance@rbmgroup.co.za**. Reports may be anonymous. The Company investigates every credible report, and will report criminal conduct to the authorities.

No person who reports in good faith will suffer retaliation. Protection is set out in the Whistleblower Policy.

9. Training

All personnel receive anti-bribery training at induction and annually. Those in commercial, procurement, trading and export roles, and those dealing with public officials, receive enhanced training including scenario work on facilitation payments and intermediary risk. Records are retained.

10. Consequences

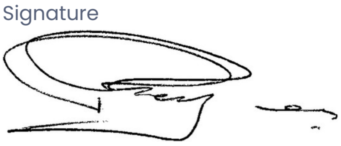
Breach is a dismissible disciplinary offence and may constitute a criminal offence carrying personal liability, including imprisonment. Contracts with third parties who breach this Policy will be terminated. The Company will co-operate fully with any investigation by a competent authority.

11. Review

This Policy is reviewed at least annually by the Compliance Officer. Material amendments require the approval of the Managing Member.

Approval

Approved by the Managing Member of RBM Mineral Resources CC on 19 August 2026, with effect from that date.

Signature  **R H Rayman — Managing Member** for and on behalf of RBM Mineral Resources CC	Date **19 August 2026** Effective from