RBM MINERAL RESOURCES CC

A MEMBER OF THE RBM GROUP · SOUTH AFRICA | UAE

COUNTERPARTY INFORMATION

Financial Crime Compliance Statement

A summary of our anti-money laundering, sanctions and responsible sourcing controls

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1. Our position

RBM Mineral Resources CC, a member of the RBM Group (the **"Company"**), refines, trades and exports precious metals under licence and permit issued by the South African Diamond and Precious Metals Regulator. We conduct our affairs as an accountable institution under the Financial Intelligence Centre Act 38 of 2001, and we are registered with the Financial Intelligence Centre as a precious metal dealer under item 20 of Schedule 1 to that Act, goAML Reporting Entity ID 66956, registered on 9 April 2024.

This statement is published for the benefit of our customers, suppliers, refinery partners, banks and auditors. It summarises the financial crime controls we apply. The controls themselves are set out in our Risk Management and Compliance Programme, adopted under section 42 of that Act, which is an internal document because it records the specific thresholds and escalation triggers we apply. We do not publish those, for the same reason a bank does not publish its fraud rules.

2. What we do

- **We know who we deal with.** No counterparty transacts with us until we have verified its identity, traced its ownership through to the natural persons who ultimately own or control it, and confirmed the authority of the people who sign for it.
- **We screen.** Every counterparty, every beneficial owner, every authorised signatory and every settlement bank is screened against targeted financial sanctions, prominent-person and adverse-media sources — at onboarding, and again whenever a sanctions list changes.
- **We rate risk, and act on it.** Every relationship carries a documented risk rating driven by the counterparty, the transaction, how it reached us, and the jurisdictions involved. A higher rating means deeper due diligence, senior approval, and closer monitoring — not a longer form.
- **We verify origin.** Mineral-bearing material must be supported by documentation of origin and chain of custody sufficient to identify the mine or point of first purchase, and the permit under which it was lawfully obtained.
- **We monitor.** Transactions are checked against the counterparty profile we hold. Relationships are formally reviewed on a cycle set by their risk rating, and out of cycle whenever something material changes.
- **We report.** We report cash transactions above the prescribed threshold, and suspicious and unusual transactions, to the Financial Intelligence Centre within the prescribed periods.
- **We keep records.** Identification, transaction, screening and reporting records are retained for at least five years and can be produced to a supervisory body on request.
- **We train, and we test.** Our people are trained on these obligations at induction and annually, and the programme is tested internally at least once a year.

3. What we will not do

We will not deal with a designated person or entity, or anyone owned or controlled by one. We will not accept material whose origin cannot be established. We will not proceed where a counterparty is unwilling to identify its beneficial owners. We will not offer or accept a bribe or a facilitation payment. We will not take part in an arrangement structured to disguise the origin of funds or of minerals, or to evade sanctions or a reporting obligation.

Commercial considerations do not override any of the above.

4. Continuous improvement

Our compliance framework is under active development. Certain controls are being strengthened on a phased basis as systems and contracted verification services are brought into service; that programme is documented internally, owned by our Compliance Officer, and reported to our Managing Member. We are happy to discuss our current position, and to complete counterparty due diligence questionnaires, on request.

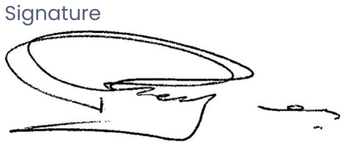
5. Related published documents

Document	What it covers
Supply Chain Policy	Responsible sourcing, mapped to Annex II of the OECD Due Diligence Guidance
OECD Undertaking	Our formal undertaking under that Guidance
Anti-Bribery and Corruption Policy	Bribes, facilitation payments, gifts and intermediaries
Sanctions Policy	Targeted financial sanctions and screening
Code of Ethics and Business Conduct	The standards we hold ourselves to
Whistleblower Policy	How anyone may report a concern to us, in confidence
Privacy Policy and PAIA Manual	How we handle personal information, and how to request access to records

All are published at rbmgroup.co.za. Questions about this statement, and requests for further compliance information, may be addressed to compliance@rbmgroup.co.za.

Approval

Approved by the Managing Member of RBM Mineral Resources CC on 20 August 2026, with effect from that date.

Signature	Date
	
R H Rayman — Managing Member for and on behalf of RBM Mineral Resources CC	**20 August 2026** Effective from