RBM MINERAL RESOURCES CC

A MEMBER OF THE RBM GROUP · SOUTH AFRICA | UAE

FINANCIAL CRIME COMPLIANCE

Sanctions Policy

Targeted financial sanctions, trade restrictions and screening controls

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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"**), complies with targeted financial sanctions and trade restrictions. The Company trades internationally in precious metals and operates in both South Africa and the United Arab Emirates, which places it within the practical reach of several sanctions regimes.

It applies to every member, officer, employee, contractor and agent, and to every client, supplier, counterparty, intermediary, vessel, route and payment involved in the Company's business.

2. Regimes the Company observes

- Targeted financial sanctions imposed by the United Nations Security Council and given effect in South Africa under the Financial Intelligence Centre Act 38 of 2001.
- Measures under the Protection of Constitutional Democracy against Terrorist and Related Activities Act 33 of 2004.
- South African exchange control and export control requirements.
- Where the Company, its counterparty, its bank or the currency of settlement brings a transaction within their scope: sanctions administered by the United States Office of Foreign Assets Control, the United Kingdom Office of Financial Sanctions Implementation, and the European Union.

Where regimes conflict, the Compliance Officer obtains legal advice before the Company acts.

3. What is prohibited

The Company will not, directly or indirectly:

- deal with, or make funds or economic resources available to or for the benefit of, any designated person or entity, or any entity owned or controlled by one;
- transact with a counterparty located in, or material originating in or transiting, a comprehensively sanctioned jurisdiction;
- participate in any arrangement structured to evade sanctions, including transhipment, relabelling of origin, use of a front company or intermediary, or settlement designed to obscure a party; or
- provide any service that would breach a trade restriction applicable to precious metals.

4. Screening

Screening is a control, not a formality. The Company screens:

- every client, supplier, counterparty, beneficial owner and authorised representative at onboarding, and before any single transaction;
- the entire counterparty base whenever a relevant sanctions list is amended;
- the origin, route and destination of material, and the identity of transporters and, where relevant, vessels; and
- every payment instruction, including the beneficiary bank and any intermediary bank.

Screening results, including negative results, are recorded on the counterparty file with the date and the lists screened against.

5. Ownership and control

A counterparty that is not itself designated may still be prohibited if it is owned or controlled by a designated person. The Company therefore traces ownership to natural persons, aggregates the holdings of designated persons, and treats an aggregate holding at or above the threshold applied by the relevant regime, or the existence of effective control by other means, as designation.

6. If a match is identified

Step	Action
1 Stop	Halt the transaction immediately. Do not release funds, material or documents. Do not notify the counterparty of the reason.
2 Escalate	Report to the Compliance Officer the same day. Only the Compliance Officer may clear or confirm a match.
3 Assess	Confirm whether the match is true, considering name, date of birth, identifiers, jurisdiction and ownership. Record the assessment.
4 Freeze	If confirmed, freeze any property in the Company's possession or control and do not deal with it.
5 Report	Report to the Financial Intelligence Centre without delay, and to any other authority required.
6 Record	Retain the full decision trail for at least five years.

7. Contractual protection

Contracts with clients, suppliers and intermediaries include sanctions representations and warranties, an undertaking to notify the Company immediately of any designation or investigation, an audit right, and a right of immediate suspension and termination without liability where a sanctions risk arises.

8. Prohibition on tipping off

No person may inform a counterparty that it has been screened, matched, frozen or reported, except as the law permits. Breach is a disciplinary offence and may be a criminal offence.

9. Training and testing

Personnel in commercial, trading, logistics, export and finance roles receive sanctions training at induction and annually, covering list structures, ownership and control, evasion typologies and the escalation route. The Compliance Officer tests screening coverage and quality at least annually and reports to the Managing Member.

10. Consequences

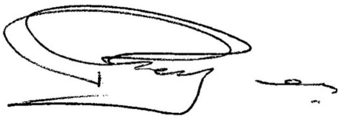
Sanctions breaches carry severe consequences, including criminal liability for individuals, financial penalties, loss of banking relationships and loss of licences. Breach of this Policy is a dismissible disciplinary offence.

11. Review

This Policy is reviewed at least annually by the Compliance Officer, and whenever a relevant regime changes materially. 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	Date
	
R H Rayman — Managing Member for and on behalf of RBM Mineral Resources CC	**19 August 2026** Effective from