RBM MINERAL RESOURCES CC

A MEMBER OF THE RBM GROUP · SOUTH AFRICA | UAE

RESPONSIBLE SOURCING

Supply Chain Policy

Responsible sourcing of minerals from conflict-affected and high-risk areas

Adopted in alignment with the *OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas* and the Model Supply Chain Policy set out in its Annex II.

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1. Purpose and scope

In this Policy, **"the Company"** means RBM Mineral Resources CC, a member of the RBM Group, which holds the refining licence and export permit issued by the South African Diamond and Precious Metals Regulator. References to RBM Group are to the wider group of which the Company is a member.

This Policy sets out the standards RBM Mineral Resources CC applies to the sourcing, handling, processing and trade of minerals and precious metals, and the standards it requires of its suppliers, agents and business partners. It exists to ensure that the Company does not contribute to conflict, serious human rights abuses, corruption or financial crime through its supply chain, and that it can demonstrate this to customers, regulators, financial institutions and auditors.

This Policy applies to every business unit of RBM Mineral Resources CC, to all members, officers, employees, contractors and temporary staff, and to all suppliers of mineral-bearing material, whether sourced in South Africa, elsewhere in Africa, or internationally. It applies across the full value chain: mining operations, mineral processing, refining coordination, logistics, export and distribution.

Where this Policy conflicts with a lower standard permitted by local law or practice, this Policy prevails. Where local law imposes a higher standard, the local law prevails.

2. Definitions

- **Conflict-affected and high-risk area (CAHRA)** — an area identified by the presence of armed conflict, widespread violence or other risks of harm to people, including areas of political instability or repression, institutional weakness, insecurity, collapse of civil infrastructure and widespread violence.
- **Non-state armed group** — an organised armed group operating outside the lawful command of the state.
- **Beneficial owner** — the natural person who ultimately owns or controls a supplier, or on whose behalf a transaction is conducted.
- **Red flag** — a fact or circumstance that indicates a heightened risk that material may be connected to a risk identified in Annex II of the OECD Guidance.
- **Supplier** — any counterparty from whom the Company acquires mineral-bearing material or related services, including agents, intermediaries and transporters.

3. Policy statement

RBM Mineral Resources CC is committed to sourcing minerals responsibly. The Company will not knowingly source from, trade with, or provide any form of support to, any party that contributes to conflict or to the serious abuses set out in Section 4. Where the Company identifies such a risk, it will act — by suspending or discontinuing the relationship, or by managing the risk under a documented mitigation plan with measurable improvement targets.

Commercial considerations will not override this Policy. No employee will suffer detriment for refusing to proceed with a transaction on the grounds of this Policy, or for raising a concern in good faith.

4. Commitments on Annex II risks

The following commitments correspond directly to the risks identified in Annex II of the OECD Due Diligence Guidance. Annex A of this Policy maps each commitment to the corresponding Annex II category.

4.1 Serious abuses associated with extraction, transport or trade

The Company will not tolerate, profit from, contribute to, assist or facilitate the commission by any party of:

- any form of torture, or cruel, inhuman or degrading treatment;
- any form of forced or compulsory labour, being work or service exacted from a person under threat of penalty and not offered voluntarily;
- the worst forms of child labour, and no person under the age of 18 will be engaged in hazardous work at any Group site;
- other gross human rights violations or abuses, including widespread sexual violence; or
- war crimes, other serious violations of international humanitarian law, crimes against humanity or genocide.

Where the Company identifies a reasonable risk that a supplier is committing any of these abuses, or is sourcing from or linked to any party committing them, it will immediately suspend the relationship and, following assessment, discontinue it where the risk is confirmed.

4.2 Direct or indirect support to non-state armed groups

The Company will not provide direct or indirect support to non-state armed groups through the extraction, transport, trade, handling or export of minerals. Prohibited support includes the procurement of minerals from, payments to, or the provision of logistical assistance or equipment to, non-state armed groups or their affiliates who:

- illegally control mine sites, transportation routes, points where minerals are traded, or upstream actors in the supply chain;
- illegally tax or extort money or minerals at mine sites, along transportation routes, or at points where minerals are traded; or
- illegally tax or extort intermediaries, export companies or international traders.

The Company will immediately suspend or discontinue engagement with any upstream supplier found to provide such support.

4.3 Public or private security forces

The Company recognises the legitimate role of public and private security forces in providing security to personnel, facilities, equipment and property. The Company will not tolerate any direct or indirect support to public or private security forces that commit the abuses described in Section 4.1, or that illegally control or tax mine sites, transport routes or trading points.

Where public or private security forces are engaged at a Group site, the Company will require that their engagement is consistent with the Voluntary Principles on Security and Human Rights, that their role is limited to the protection of persons and property, and that any allegation of abuse is reported to the competent authorities.

4.4 Bribery and fraudulent misrepresentation of the origin of minerals

The Company will not offer, promise, give, solicit or accept any bribe or improper advantage, whether to a public official or a private party, whether directly or through an intermediary, and whether or not local practice tolerates it. Facilitation payments are prohibited.

The Company will not misrepresent, and will take reasonable steps to ensure that its suppliers do not misrepresent, the origin of minerals. All material entering the Company's supply chain must be supported by documentation of origin sufficient to identify the mine or point of first purchase, the chain of custody to the point of receipt, and the identity and beneficial ownership of the supplier.

This Section is to be read together with the Company's Anti-Bribery and Corruption Policy.

4.5 Money laundering

The Company will support and contribute to efforts to eliminate money laundering where it identifies a reasonable risk arising from, or connected to, the extraction, trade, handling, transport or export of minerals — including minerals derived from the illegal taxation or extortion of minerals at any point in the supply chain.

Customer and supplier due diligence, beneficial ownership identification, sanctions and politically exposed person screening, transaction monitoring, record-keeping and the reporting of suspicious and reportable transactions are governed by the Company's Risk Management and Compliance Programme, which forms part of the Company's obligations as an accountable institution.

4.6 Payment of taxes, fees and royalties due to governments

The Company will ensure that all taxes, fees and royalties related to mineral extraction, trade and export are paid to the competent authorities in full and on time. Consistent with the Company's commitment to transparency and the principles of the Extractive Industries Transparency Initiative, the Company will disclose such payments where required or requested by a competent authority.

5. Requirements of suppliers

As a condition of doing business with the Company, every supplier of mineral-bearing material must:

- accept this Policy in writing, or demonstrate an equivalent policy of its own;
- provide complete and accurate information on the origin of material supplied, its chain of custody, and its own ownership and control, including beneficial ownership;
- submit to due diligence at onboarding and on an ongoing risk-based basis, including sanctions and politically exposed person screening;
- comply with all applicable laws on mining rights, permits, export, labour, health and safety, environment, tax, anti-bribery and anti-money laundering;
- permit reasonable verification, including site visits and documentary review, by the Company or its appointed independent auditor;
- notify the Company without delay of any incident, allegation or regulatory action relevant to this Policy; and

- flow equivalent requirements down to its own suppliers.

Failure to meet these requirements is grounds for suspension of trade and, where the failure is material or uncorrected, for termination.

6. Due diligence framework

The Company applies the five-step framework of the OECD Due Diligence Guidance:

6.1 Step 1 — Establish strong company management systems

The Company maintains this Policy, an internal control structure with clearly assigned responsibility, a supplier database and chain-of-custody records retained for a minimum of five years, an internal training programme, and a confidential grievance mechanism as described in Section 9.

6.2 Step 2 — Identify and assess risk in the supply chain

Every supplier is assessed at onboarding and re-assessed on a risk-based cycle. Assessment covers country and route risk, the presence of conflict-affected or high-risk areas, ownership and control, sanctions and politically exposed person exposure, and the plausibility of stated origin and volumes. Red flags are documented and escalated to the Compliance Officer.

6.3 Step 3 — Design and implement a strategy to respond to identified risks

Identified risks are reported to senior management, who decide between continuing trade while a documented mitigation plan runs, temporary suspension pending mitigation, or disengagement. Mitigation plans must state measurable objectives, performance indicators and a review date, and progress is monitored for at least six months.

6.4 Step 4 — Carry out independent third-party audit of due diligence at identified points in the supply chain

The Company will submit its due diligence practices to independent third-party audit at a frequency appropriate to its risk profile and to the requirements of its refinery partners and customers, and will co-operate fully with audits carried out by those counterparties.

6.5 Step 5 — Report annually on supply chain due diligence

The Company will publish an annual report on its supply chain due diligence, covering the management system in place, risks identified, action taken and the outcome of any audit, with due regard for commercial confidentiality and the safety of individuals.

7. Roles and responsibilities

Role	Responsibility
Managing Member	Approves this Policy, receives reporting on material risks and confirms the Company's risk appetite.
Compliance Officer	Owns this Policy, runs supplier due diligence, maintains records, delivers training, receives red-flag escalations and reports to the Managing Member.

Role	Responsibility
Commercial and trading staff	Apply this Policy at the point of sourcing, collect origin documentation, and escalate red flags before committing to a transaction.
Site and operations management	Ensure conditions at Company operations and sites comply with Section 4, including in respect of labour and security arrangements.
All personnel	Comply with this Policy and report concerns through the mechanism in Section 9.

8. Training and communication

This Policy is published on the Company's website and issued to all personnel on appointment. Personnel in commercial, trading, operations and finance roles receive training on this Policy at induction and at least annually thereafter, covering red-flag recognition, origin documentation and escalation. Attendance records are retained by the Compliance Officer.

9. Raising a concern

Any person — employee, supplier, community member or third party — may report a concern relating to this Policy in confidence to **compliance@rbmgroup.co.za**. Reports may be made anonymously.

The Company will not tolerate retaliation against any person who raises a concern in good faith, and any act of retaliation is itself a disciplinary offence. Concerns are acknowledged, investigated proportionately, and their outcome recorded. This mechanism operates alongside, and does not replace, the Company's Whistleblower Policy or any right to report to a competent authority.

10. Monitoring, audit and corrective action

The Compliance Officer monitors adherence to this Policy on an ongoing basis and reports to the Managing Member at least annually. Internal review covers supplier files, origin documentation, screening records and training completion. Where a deficiency is identified, a corrective action is recorded with an owner and a due date, and closure is verified.

11. Non-compliance

Breach of this Policy by an employee may result in disciplinary action up to and including dismissal, and may be reported to the competent authorities. Breach by a supplier may result in suspension of trade, termination of the relationship, and reporting to the competent authorities. Nothing in this Policy limits the Company's obligations to report to any regulator.

12. Review

This Policy is reviewed at least annually by the Compliance Officer, and additionally whenever there is a material change to the Company's operations, its supply base, or applicable law or international guidance. Material amendments require the approval of the Managing Member. The version history is recorded in the document control table on the cover page.

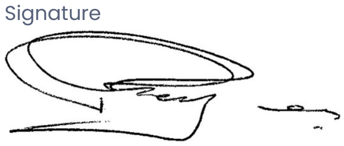
Annex A — Mapping to OECD Annex II

This Annex maps the commitments in Section 4 of this Policy to the risk categories of Annex II of the OECD Due Diligence Guidance, so that customers, auditors and refinery partners can verify coverage directly.

OECD Annex II risk category	Section	Position
Serious abuses associated with the extraction, transport or trade of minerals	**4.1**	Zero tolerance
Direct or indirect support to non-state armed groups	**4.2**	Zero tolerance
Public or private security forces	**4.3**	Controlled
Bribery and fraudulent misrepresentation of the origin of minerals	**4.4**	Zero tolerance
Money laundering	**4.5**	Zero tolerance
Payment of taxes, fees and royalties due to governments	**4.6**	Full compliance

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