Cookson Precious Metals Ltd – part of the Heimerle + Meule Group

Responsible Sourcing Compliance Report

Annual report on supply-chain due diligence for gold and silver

Document reference	RS-REP-001
Company name	Cookson Precious Metals Ltd (trading as Cooksongold)
Sites in scope	59–83 Vittoria Street, Birmingham, B1 3NZ (head office, manufacture, retail store, sales, scrap purchasing and pre-processing); 49 Hatton Garden, London, EC1N 8YS (retail store, sales and scrap purchasing)
Reporting year	1 January – 31 December 2025
Date of this report	13th July 2026
Version	1.0
Responsible person	Technical Director (Responsible Sourcing Compliance Officer)
Approved by	Managing Director or Finance Director (oversight)

Step 1 – Company Management Systems

Compliance statement: Cooksongold has fully implemented Step 1: strong company management systems are in place across both sites.

1.1 Supply chain policy

Cooksongold's commitment is set out in the Responsible Sourcing Policy (RS-POL-001). The Policy covers all OECD Annex II threat-financing risks – conflict financing and support to illegitimate armed groups, serious human rights abuses, money laundering and terrorist financing, bribery and fraudulent misrepresentation of origin, and non-payment of taxes and royalties in CAHRAs – together with the environmental, social and governance factors we consider in our supply chains.

The Policy is approved at senior level, reviewed at the annual LBMA policy review held each February involving the relevant directors and managers (next review: February 2027), is publicly available in English on the Cooksongold website, and is communicated to all relevant staff and supplying counterparties. Reporting scope covers both sites listed above; materials in scope are gold and silver received as jewellery scrap, manufacturing scrap, sweeps/O&E, dental, rough and investment bars, and live scrap. Also, gold and silver in fine or alloyed form which are further processed.

1.2 Internal management structure

Overall oversight rests with the Managing Director or the Finance Director and the Senior Management Team (SMT), whose role is one of oversight and challenge. Operational authority is delegated to the Technical Director, who acts as Responsible Sourcing Compliance Officer and reports directly to the Managing Director or Finance Director. The Compliance Officer is supported day-to-day by the Scrap Operations Manager across the PMP Counter, Strong Room, Melt House and in all mustering activities. The full governance structure, roles and responsibilities are documented in the Responsible Sourcing Management System Manual (RS-MAN-001).

All staff involved in the precious-metal supply chain are trained using the Responsible Sourcing training pack (RS-TRN-001), with attendance and understanding confirmed on the Responsible Sourcing Training Record (RS-TRN-002) and records retained by Human Resources. In the reporting year, at least thirty employees were trained on the processes involved in the supply chain due diligence processes. Where needed employees were given more training on specific topics e.g. anti-bribery, anti-money laundering. No material violations of the internal due diligence process were escalated in the period.

Cash and record-keeping policy. No cash is accepted more than £8,250, in a single transaction or cumulatively within any 90-day period; any amount above £8,250 must be settled by bank transfer through official banking channels. Receipts over £5,000 are notified to Credit Control and the Financial Controller, transactions are never altered or split to fall below the threshold, and any approach to the limit is referred to Finance. Cash handling is governed by the Anti-Money Laundering Policy (HMG-POL-016 / PMP-POL-016). Records – including KYC files, goods-inwards, assay, payment and authorisation records – are retained for at least five years.

1.3 Traceability and chain of custody

Every lot is booked to the counterparty's account in the AS400 system, on which all material movements, product flags, batch numbers, assay records and despatch documentation are recorded; Unique batch and bar numbers (BP/BM/PP) follow material through the site from receipt at the PMP Counter, through Strong Room custody, melting & assay, to pre-muster and despatch to the external refiner. Information recorded includes the counterparty, material type, weight, assay, dates of receipt & despatch, and supporting documents. The controlled process maps RS-MAP-001 to RS-MAP-004 document the physical flow.

1.4 Counterparty engagement

Every supplying counterparty completes the Cookson Precious Metals Due Diligence process. Counterparties are expected to comply with the Responsible Sourcing Policy (RS-POL-001), or to operate their own supply-chain policy at least consistent with OECD Annex II; this expectation is embedded in our Terms of Trading. Where a counterparty will not provide KYC information or sign the provenance declaration, material is not accepted. There were no due diligence process breaches that arose during the reporting period. No mined material was processed during the reporting period.

1.5 Confidential grievance mechanism

A company-wide confidential grievance mechanism is operated under the Grievance Mechanism Procedure (RS-PRO-001). It is open to internal and external parties through the Cooksongold Contact Centre (0345 100 1122), the info@cooksongold.com mailbox, the complaint form on the Cooksongold Help site ("How do I make a complaint?"), in person, or anonymously, including via the cross-industry Minerals Grievance Platform. Grievances are recorded in the Grievance Register maintained by the Scrap Operations Manager, acknowledged within 5 working days, investigated, and outcomes communicated to the complainant with a right of review within 20 working days. Good-faith reporting is protected from reprisal.

Disclosure: In the reporting year, no grievances relevant to the precious-metal supply chain were received.

Step 2 – Risk Identification and Assessment

Compliance statement: Cooksongold has fully implemented Step 2 through the Risk Assessment and Management Strategy (RS-PRO-002).

2.1 Due diligence process

KYC assessments are operated by Finance (including Credit Control), Product Management and Supply Chain, supported by the Due Diligence Form, which identifies the counterparty, its beneficial owners (>25% shareholding) and persons acting on its behalf, with screening for Politically Exposed Persons and sanctions. Provenance is verified through the Declaration of Provenance and goods-inwards checks; mined material is excluded by declaration and by inspection at receipt, and any suspected mined-origin metal is separated, marked and queried. Transaction monitoring covers Companies House and VAT/missing-trader indicators, pricing anomalies and volume monitoring, with sudden or sustained volume increases flagged for review.

2.2 Risk classification

Counterparties and transactions are classified Low, Medium or High using a documented severity × likelihood matrix that considers counterparty type, location (including CAHRA exposure), material type, payment behaviour and the presence of red flags. All risk bands are re-reviewed at least annually; High-risk counterparties remain subject to enhanced due diligence at each transaction. A confirmed OECD Annex II red flag means the material does not proceed, regardless of score.

Disclosure: In the reporting year, all counterparties were rated and none were highlighted as high risk. Therefore, there was no enhanced due diligence required.

2.3 Enhanced due diligence

Enhanced due diligence for High-risk supply chains includes site visits to counterparty premises to verify operations and material provenance, deeper corporate and beneficial-ownership checks, closer transaction monitoring, and escalated authorisation. During the reporting year there were no counterparties that required the enhanced due diligence process.

Step 3 – Risk Management

Compliance statement: Cooksongold has fully implemented Step 3.

Where risk is identified, the documented strategy in RS-PRO-002 provides for (i) mitigation with measurable improvement while continuing to trade, (ii) suspension of trading while mitigating, or (iii) disengagement and rejection of material. Decisions are taken by the Compliance Officer; serious or high-risk decisions are escalated to the Managing Director or Finance Director and the SMT. Each mitigation is recorded as a Corrective Action Plan with measurable actions, an owner and a target date, followed up within six months to evaluate significant and measurable improvement.

Authorisation. Authority to accept a counterparty, account or transaction is set by both value and risk rating, whichever is higher: under £15,000 and low risk – PMP Counter / Sales team; £15,000 up to £1,000,000 or medium risk – relevant manager (Scrap Operations, Industrial or Scrap Sales); above £1,000,000 or high risk – a Director. Any bank-transfer payment of £15,000 or above requires secondary authorisation, with segregation of duties through Credit Control and Accounts Payable. All authorisations are recorded so the decision trail is auditable.

Disclosure: In the reporting year, mitigation measures were applied to one counterparty. One counterparty was submitted to a watch list. High-risk supply chains, mitigation status and improvement-plan progress are reported by the Compliance Officer to the Managing Director or Finance Director and the SMT promptly for serious matters and at least at each Management Review meeting.

Step 4 – Independent Third-Party Assurance

As a collector and supplying counterparty, Cooksongold's despatch of material is to LBMA Good Delivery refiners within the Heimerle + Meule Group (Heimerle + Meule GmbH and SEMPSA JP), whose Refiner's Compliance Reports are independently assured annually by KPMG under ISAE 3000 and published with their reports. Cooksongold supplies the underlying counterparty due-diligence evidence supporting those engagements and is subject to the Group's oversight. Cooksongold's own management system is additionally subject to ISO 9001, ISO 14001 and ISO 45001 certification audits, and to periodic RJC certification audits.

Step 5 – Annual Reporting

This report is Cooksongold's Responsible Sourcing Compliance Report for the reporting year, prepared following the five-step framework and the disclosure headings of the LBMA Disclosure Guidance (Version 3, Dec 2025) applied proportionately to Cooksongold's role as a collector and supplying counterparty. It is reviewed at the annual LBMA policy review each February, approved before release, and made available on the Cooksongold website, to the refiner and interested stakeholders on request. The Responsible Sourcing Policy (RS-POL-001) is publicly available on the Cooksongold website. Feedback on this report may be sent to the Responsible Sourcing Compliance Officer via the Cooksongold Contact Centre or info@cooksongold.com.

Management Conclusion

The Responsible Sourcing Management System documented in RS-MAN-001 and its supporting documents (RS-POL-001, RS-PRO-001, RS-PRO-002, RS-TRN-001/002, RS-MAP-001–004, SOP011–SOP014 / WI004) has operated throughout the reporting year across both sites. Based on the activities described above, Cooksongold's management concludes that the company has implemented an effective supply-chain due diligence system consistent with the requirements of the LBMA Responsible Gold and Silver Guidance's, proportionate to its role in the supply chain, for the reporting year ended 31 December 2025.

Approved by	Managing Director or Finance Director
Signature	
Date	13th July 2026

Document Control

Date	13th July 2026
Description of change	First issue – Responsible Sourcing Compliance Report for reporting year 2025.
Originator	Compliance Officer
Approved	Managing Director or Finance Director