Responsible Sourcing Policy

Gold and Silver Supply Chain Due Diligence

Cooksongold (Cookson Precious Metals Ltd, “the Company”, “we”) sources and processes recycled gold and silver and is committed to sourcing these metals responsibly. This Policy sets out our commitment to supply chain due diligence in line with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (including its Gold Supplement), the LBMA Responsible Gold Guidance and the LBMA Responsible Silver Guidance.

It applies to all gold and silver received, processed and sold by the Company, to all employees, officers and directors, and to all of our supplying counterparties.

1. Our Commitment

We will not knowingly source or process precious metals in a way that contributes to, or benefits from, the following risks. We will not tolerate, profit from, contribute to, assist with or facilitate:

- The financing of conflict, or any direct or indirect support to illegitimate non-state armed groups or public or private security forces that illegally control, tax or extort at mine sites, transport routes or trade points;
- Serious human rights abuses associated with the extraction, transport or trade of precious metals – including torture or cruel, inhuman or degrading treatment; forced or compulsory labour; the worst forms of child labour; widespread sexual violence; war crimes, crimes against humanity or genocide;
- Money laundering or the financing of terrorism;
- Bribery, corruption, or the fraudulent misrepresentation of the origin of precious metals;
- Non-payment of taxes, fees and royalties due to governments in respect of mineral extraction, trade and export from Conflict-Affected and High-Risk Areas (CAHRAs).

Where we identify reasonable risk of any of the above, we will respond in accordance with our risk management procedures, which may include enhanced due diligence, mitigation with measurable improvement, suspension or termination of the relationship, and reporting to the relevant authorities.

2. Environmental, Social and Governance (ESG) Commitments

Beyond the threat-finance risks above, we are committed to addressing adverse ESG factors in our primary supply chain. We expect our counterparties to manage, and we make risk-based enquiries into:

- Compliance with environmental, health, safety and labour regulation in the country of operation;
- Environmental management, including air, water and land pollution, water stewardship, and avoidance of unauthorised sourcing from World Heritage Sites and Protected Areas;
- Safe storage, handling and disposal of hazardous chemicals, including mercury and cyanide, and support for the International Cyanide Management Code;

- Fair management of labour, including remuneration, working hours, collective bargaining, non-discrimination, diversity and the safeguarding of workers;
- Responsible community engagement, including land acquisition, resettlement, cultural heritage, indigenous peoples and mine closure planning;
- Business integrity and ethical conduct, including support for transparency initiatives such as the Extractive Industries Transparency Initiative (EITI).

We recognise the legitimate role of Artisanal and Small-Scale Mining (ASM). We do not operate a blanket ban on ASM-sourced material; instead, where we engage with such supply chains, we work to support safer practices and to reduce negative environmental, health and safety impacts.

3. How We Implement This Policy

We apply the OECD five-step risk-based due diligence framework across our precious metals supply chains:

- **Strong management systems –** board-level oversight, a senior Compliance Officer, traceability, staff training and a confidential grievance mechanism;
- **Risk identification –** Know Your Counterparty (KYC) due diligence, supply chain mapping, transaction monitoring and risk classification;
- **Risk management –** a documented strategy to respond to identified risks, with monitoring and escalation to senior management;
- **Independent assurance –** annual third-party assurance of our compliance reporting;
- **Public reporting –** an annual, publicly available Compliance Report on our due diligence practices and performance.

4. Governance and Responsibility

Authority and accountability for responsible sourcing rest with the Board (or a committee appointed by the Board), which reviews the effectiveness of this Policy and the due diligence programme at least annually. A senior Compliance Officer, reporting to the CEO and/or the Board, is responsible for day-to-day implementation. Every employee involved in the precious metals supply chain is responsible for complying with this Policy and the procedures that support it.

5. Grievances and Whistleblowing

Any employee or external stakeholder may raise a concern about our precious metals supply chain confidentially, and without fear of reprisal, through our grievance mechanism, as set out in the Grievance Mechanism Procedure (RS-PRO-001): 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?” – refer to the Cooksongold website), or in person. Concerns may also be raised through the cross-industry Minerals Grievance Platform. All grievances are treated seriously, investigated and, where appropriate, acted upon, and are recorded in the Grievance Register spreadsheet maintained by the Scrap Operations Manager.

6. Review and Availability

This Policy is approved at senior level and is reviewed at the annual LBMA policy review, which takes place in February of every year and involves the relevant directors and managers; the next annual review will take place in February 2027. The Policy is updated as circumstances require. It is publicly available in English on our website and is communicated to all relevant staff and supplying counterparties.

Approval

Name & Position	Signature	Date
Managing Director or Finance Director		13 July 2026