

SUPPLIER CODE OF CONDUCT



INNOVATION



COMMITMENT



ACCOUNTABILITY



RESPECT



ENABLING



SAFETY

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Introduction

Sibanye-Stillwater is a multinational mining and metals processing group with a diverse portfolio of operations, projects, and investments across five continents ("the Group"). The Group is also one of the foremost global recyclers of PGM autocatalysts and has interests in leading mine tailings retreatment operations.

The Group is one of the world's largest primary producers of platinum, palladium, and rhodium and is a top tier gold producer. It also produces and refines iridium and ruthenium, nickel, chrome, copper, and cobalt. The Group has recently begun to diversify its asset portfolio into battery metals mining and processing and increase its presence in the circular economy by growing its recycling and tailings reprocessing exposure globally.

Scope

This Supplier Code of Conduct ("Code") sets out the principles for and expectations on our suppliers, consultants, service providers, distributors or any other party involved in the supply chain("Suppliers"), regarding for example ethical sourcing, environmental sustainability, and human rights.

Compliance

The Group expects all Suppliers to adhere to the spirit and principles of this Code and observe all applicable local, national, and international laws, regulations, and conventions for the jurisdiction in which they operate. The Group retains the right to decline to enter into and/or to terminate any agreement or contract with any Suppliers involved in or associated with any unethical, fraudulent, corrupt or otherwise illegal or disreputable activities that may harm the Group's reputation.

Suppliers must uphold the highest standards of integrity, honesty, and ethical behavior in all their dealings. If this Code conflicts with any applicable local, national, or international laws, regulations, and conventions, unless otherwise required by applicable laws, the higher and more stringent standard takes precedence.

Where a Supplier uses subcontractors to provide goods and service to the Group, each Supplier is responsible for ensuring awareness and the expected adherence to the Code by its subcontractors.

Labour and human rights

Professional conduct

Suppliers providing products, goods, work, services, or any other compensated activity for the Group are expected to conduct themselves professionally, report for work fit for duty, meet performance criteria, and deliver a high standard and quality of work.

Relationships

Suppliers are expected to treat their own employees, suppliers, subcontractors, and business partners with fairness, honesty, and respect.

Forced labour

Suppliers may not subject any employee or other third-party personnel to, or otherwise engage in or support, any other form of modern slavery, bonded (including debt bondage), indentured, involuntary or exploitative prison labour, forced or compulsory labour, or employ children or engage in human trafficking.

Suppliers must implement appropriate mechanisms to ensure that these requirements are complied with by them and their subcontractors.



Fair wages and working hours

Suppliers must comply with applicable laws, collective agreements, and industry standards regarding wages and compensation, working hours, holidays, etc.

Suppliers are expected to:

- Pay employees fair wages that meet or exceed legal minimum wage requirements and allow for a decent standard of living. This includes providing equitable wages for student employees (where permitted), interns and apprentices performing similar or equal tasks to entry-level workers.
- Compensate employees fairly for any overtime work in accordance with local labour laws and regulations.
- Overtime must be voluntary and may not exceed legal limits.
- Adhere to legal limitations on working hours and ensure employees are not required to work excessively long hours that compromise their health, safety, and work-life balance.
- Provide employees with regular breaks and rest periods to ensure their well-being and prevent fatigue.
- Ensure that wage and compensation practices are free from discrimination.

Non-discrimination and equal opportunity

Suppliers must treat all individuals with respect and dignity, regardless of their race, gender, gender identity or expression, creed, ethnicity, or national origin, colour, pregnancy, marital status, religion, age, disability, sexual orientation, conscience, beliefs, culture, language, or other legally protected characteristics or attributes. Equal employment opportunities must be provided to all, and unlawful discrimination of any kind must not be tolerated. Workers should be reasonably accommodated for their religious practices, and not subjected to medical or physical tests that could be used discriminatorily.

Diversity

Suppliers are encouraged to promote diversity within their companies and adopt inclusive hiring practices that promote diversity at all levels of their workforce, including leadership positions.

Health and safety

Suppliers must comply with health and safety laws, and are expected to:

- Provide a safe, healthy, and productive work environment for all employees, including both physical and psychosocial well-being.
- Conduct regular assessments to identify workplace hazards and implement measures to mitigate or eliminate them.
- Develop and implement adequate safeguards to address potential safety risks, including emergency response procedures.
- Provide employees with adequate training and education on health and safety practices, including the proper use of safety equipment.
- Provide appropriate personal protective equipment to employees, such as helmets, gloves, masks, and goggles, etc. based on the specific hazards of their work.
- Establish clear emergency procedures, including evacuation plans, fire drills, and communication protocols.
- Establish mechanisms for employees to report health and safety concerns without fear of retaliation.
- Conduct regular health and safety audits to ensure compliance with established standards and continuous improvement.
- Make reasonable accommodations for pregnant/nursing persons including those associated with their work assignments and reduction of any workplace health and safety risks to which they may be exposed.



Freedom of association and collective bargaining

Suppliers must respect their employees' rights to form, organise, and join trade unions or other employee associations and engage in collective bargaining and peaceful assembly, without fear of discrimination, reprisal, intimidation or harassment.

Alcohol, drugs, and substance abuse

In protecting the safety of our employees and Suppliers, the Group has a zero-tolerance approach to alcohol, illegal drugs, and controlled/prohibited substance abuse. The manufacture, distribution, dispensing, possession, or use of alcohol, controlled/prohibited substances, or illegal drugs by any Supplier or its suppliers, or subcontractors is prohibited on any Group premises.

No Supplier or its supplier, subcontractor may have on or within their body any detectible¹ quantity of alcohol, controlled substances, or illegal drugs, or the metabolites of any controlled substance or illegal drugs while on duty or reporting for duty.

While the use of marijuana has been legalised in some jurisdictions for medicinal and/or recreational uses, it remains an illegal drug in others. Personnel may not consume or be impaired by marijuana, while on duty or at any Group premises.

Payment errors

No Supplier may benefit from any overpayment or payment of monies made in error or any payment to which they are not entitled. No Supplier may aid or abet in submitting an invoice with incorrect information for their benefit or the benefit of any other party, nor may they submit an invoice without proper support and/or verification that the goods or services have been delivered and the invoice is valid and accurate.

Ethical business practices

Anti-corruption and bribery

The Group prohibits and condemns fraud and theft, including bribery, embezzlement, corruption and extortion of any kind.

Suppliers may not offer, promise, solicit, accept bribes or kickbacks, or provide gifts of money, benefits, or anything else of value (such as gifts or favours) or exercise improper influence to obtain or retaining a benefit, as an inducement to favorable action or forbearance, or any other improper advantage in conducting their business. This applies to relationships with governments, governmental organisations, officials and other businesses, stakeholders, civil society, and Group employees. Any such activity by employees, agents, stakeholders, contractors, or business partners may not be tolerated.

Compliance with the applicable anti-corruption and bribery laws and regulations is a requirement.

Money laundering

All forms of money laundering or terrorist financing of any kind, directly or indirectly through intermediaries, other third parties and/or any employee are prohibited, and country specific legislation introduced to combat money laundering must be complied with by all Suppliers. Suppliers are expected to have adequate procedures for preventing any financial crime such as fraud, extortion, money laundering, and financing for illegal or unauthorised purposes.

¹ Above the cut-off level used by a laboratory to determine if a specimen is negative.



Suppliers are expected to only conduct business with customers, suppliers, distributors, agents, and other counterparties who are involved in legitimate business activity and whose funds or assets are derived from legitimate sources. Suppliers must promptly disclose any incident of suspected money laundering or terrorist financing that affects the Group that they become aware of through the relevant tip-offs anonymous hotline outlined below.

Economic sanctions and export controls

Suppliers are expected to comply with all applicable economic sanctions and export control laws and regulations. This includes adhering to restrictions on trade with sanctioned countries, individuals, or entities, and complying with controls on the export of specific goods.

Fair competition

Suppliers are expected to compete fairly and ethically in the marketplace. Collusion, price-fixing, bid-rigging, and any form of anti-competitive behaviour are strictly prohibited. Suppliers are expected to comply with all applicable antitrust laws applicable to their business activities.

Conflict of interest

Suppliers, including family of Suppliers and/or loyalties, must avoid situations where personal interests could be perceived to, or have the potential to conflict with their responsibilities to provide unbiased products or services.

If such a conflict of interest arises or has potential to arise, the Supplier is expected to take appropriate measures to manage or mitigate the conflict of interest and report such as required by the applicable contract terms and conditions.

Gifts

The Group is committed to maintaining the highest standards of ethical conduct in all its business relationships. To ensure transparency and integrity, no Suppliers, including their suppliers, subcontractors may offer or provide "Prohibited Gifts" to any Group employee, director, officer, and/or their close family members. This includes for example:

- Gifts of cash or cash equivalents in any amount.
- Free use of any vehicle, appliance, residence, or other property.
- Lending of money by providers (other than from financial institutions on competitive terms) or a supplier acting as guarantor for any loan, mortgage, or lien.
- Trips or other entertainment that substantially exceeds either prudent business standards or normal reciprocal business entertainment.
- Expenses paid on behalf of an employee or their close family member.

Political contributions or donations

Suppliers are expected, in their support for political parties, political representatives, or governments, to only make these contributions, whether directly or through intermediaries, in compliance with the applicable local laws and regulations.



Other donations

Any other donations made by Suppliers, whether in cash or in kind, are expected to comply with applicable local laws and regulations.

Intellectual property rights

Suppliers must respect the intellectual property rights of others and ensure the proper use, protection, and licensing of intellectual property rights.

Whistleblower protection

Suppliers are expected to establish a clear and comprehensive whistleblower policy or process that explains how employees can internally report concerns regarding unethical, undesirable, or unsafe acts or behaviours, including harassment, corruption, bribery etc. Suppliers are expected to protect employees who report concerns in good faith from retaliation and establish confidential reporting channels.

Ethical treatment and respect

Suppliers are expected to foster a workplace culture of dignity, respect and ethical treatment for all employees, suppliers, and/or subcontractors. This includes:

- Discouraging any form of harsh and inhumane treatment, corporal punishment, other physical, verbal, or mental/psychological abuse, including harassment, sexual harassment, threats, acts of violence, and bullying, or threat of any of the foregoing.
- Actively encouraging respectful communication, collaboration, and inclusivity within the workplace.
- Ensuring that disciplinary actions are fair, consistent, and proportionate to the offense committed.

Public statements including social media

Suppliers must conduct themselves appropriately and responsibly in public communications, including social media. They must not represent, or appear to represent, the Group in any way unless officially authorised to do so by the appropriate authority within the Group.

Suppliers must obtain consent from the Group before displaying, referencing, or publicly publishing their affiliation or business relationship with the Group on any social media platforms or websites.

Environmental responsibility

Suppliers must adhere to the applicable local, national, and international environmental laws, regulations, and standards. In addition, they must:

- Strive to minimise resource consumption and waste generation throughout their operations.
- Take measures to prevent pollution, including proper disposal of waste and hazardous materials, and minimising emissions to air, water, and soil.
- Implement energy efficient practices and technologies to reduce energy consumption and greenhouse gas emissions. Manage water resources responsibly, minimising water consumption and implementing measures to prevent water pollution.
- Use sustainable packaging materials and practices that minimise waste and environmental impact.
- Explore and adopt renewable energy sources as part of their operations.
- Prioritise sourcing materials from suppliers that adhere to environmentally responsible practices.
- Consider the environmental impact of their products throughout the entire life cycle, from production to disposal.



- Take measures to reduce their carbon footprint, including transportation emissions and energy use.
- Provide transparent information about their environmental performance, practices, and initiatives upon request.

Artificial Intelligence

Suppliers are expected to use Artificial Intelligence or other similar platforms, as may be applicable, ethically respecting human dignity, human rights, diversity, the individuals' right to independence, as well as the applicable data protection and privacy laws and regulations. Suppliers should take care not to divulge any Confidential Information when using Artificial Intelligence or other similar platforms.

Sibanye-Stillwater Property

Suppliers are responsible for safeguarding any Group assets entrusted to them, ensuring their appropriate and efficient use. They must take all reasonable precautions to prevent damage, theft, loss, or misuse of these assets.

All Group assets must be returned upon termination of the relationship with the Group.

Supply chain responsibility

Transparency and traceability

Suppliers must provide accurate and transparent information about their supply chain, including the:

- Origin of materials, components, and products used in their offerings.
- The location and practices of their suppliers, and subcontractors.
- Any social or environmental risks identified in their supply chain.

Suppliers must strive to be able to trace the flow of materials throughout their supply chain and implement processes to verify the accuracy of the information provided.

Ethical sourcing and labour practices

Suppliers must ensure that the materials and components used in their products are sourced ethically and responsibly. This includes:

- Ensure that their sourcing practices do not involve any violations of human rights, forced labor, child labor, or other unethical practices and adverse environmental impacts.
- Avoid contributing to geopolitical conflict and complying with high standards of anti-money laundering and counter-terrorist financing practices.
- Conduct due diligence on their suppliers to verify their adherence to ethical and legal standards.

Conflict minerals

Suppliers must commit to not using conflict minerals in their products. Conflict minerals are minerals sourced from regions where their extraction, trade, and profit are associated with armed conflict, human rights abuses, or environmental harm. This includes minerals such as tin, tantalum, tungsten, and gold ("3TG").



To promote compliance, Suppliers must:

- Provide a written declaration confirming that any minerals used in their products are conflict-free upon request.
- Conduct due diligence to trace the source of 3TG minerals and other relevant materials in their supply chain. This involves identifying and verifying the compliance of smelters and refiners with conflict-free sourcing standards.

Social responsibility

Suppliers are expected to actively contribute to the social well-being of the communities they operate in and ensure that their business practices do not harm the environment or exploit local resources and respect the cultural and social values of the communities they operate in.

Reporting

Suppliers are encouraged to establish and adopt a responsible sourcing policy and provide declarations of their responsible sourcing and supply activities upon request.

Risk management

Suppliers are expected to proactively identify, assess, manage and monitor risks within their operations, supply chain, and business practices that could adversely affect the Group. Mitigating strategies are to be established and implemented to ensure resilient supply chains and business continuity. Suppliers are expected to engage with the Group about identified risks which could have an impact on the Group and the related mitigating efforts.

Data privacy and security

Data handling and protection

Suppliers must handle and protect all data shared by or entrusted to the Group in accordance with applicable data protection, privacy, defense security, intellectual property and other similar laws, as well as non-disclosure agreements. Data must be collected, processed, and stored only for the legitimate purposes as specified in the business relationship and not for any other purpose without explicit consent. Except as expressly permitted by applicable law and any applicable non-disclosure and/or confidentiality agreement or obligation, no information may be disclosed to any person who has no need know the information and/or is not authorised to receive the information.

Suppliers must conduct regular risk assessments to identify vulnerabilities and potential weaknesses in their digital infrastructure.

Confidentiality

Suppliers must maintain strict confidentiality of the Group’s proprietary, sensitive, or personal data (and as applicable that of any Suppliers in the Group's possession) and may only be disclosed in accordance with applicable laws and regulations. The principle is to share only confidential information to those that need that specific information in executing their responsibilities and only if they are authorised to receive such information.

When appropriate, Suppliers may be asked to enter into a separate confidentiality agreement with the Group.



Cybersecurity

Suppliers must implement and maintain robust cybersecurity measures to protect against cyber threats, including hacking, malware, data leakage and unauthorised access or disclosure. Any such breach to a Suppliers systems or those of their suppliers, contractors or sub-contractors must be reported to Group ICT at ictservicedesk@sibanyestillwater.com as soon as the breach is identified. The communication must include sufficient information to assess whether the breach impacts any Group data as well as any other relevant information such as the nature of the breach, the extent of the compromise, and the remediation steps taken.

Continuous improvement

Suppliers are encouraged to continuously improve their ethical, social, and environmental practices and to engage in ongoing dialogue with the Group about such improvements.

Consequences of non-compliance

Suppliers must have an adequate process in place to ensure their compliance – and preferably that of their supply chain – with this Code, relevant laws, legislation, and other rules. Compliance may be subject to assessment and Sibanye-Stillwater and any third party appointed by the Group shall have the right to assess Suppliers' compliance with this Code. Upon request, Suppliers must participate in reviews and provide the Group with information and data to verify compliance with this Code.

Failure to comply with this Code may result in the suspension or termination of the business relationship. Though the Group may, at its sole discretion, allow Suppliers an opportunity to cure such a breach where possible and appropriate. The Group, however, reserves the right to take appropriate actions to address violations.

Notwithstanding the foregoing, any breach involving dishonesty will be reported to the relevant authorities and/or regulators. The Group also reserves the right to pursue further legal action.

Reporting of concerns

The Group expects the Suppliers to promptly report any concerns of non-conformities of this Code to the Group, including, if possible, violations by subcontractors.

The concerns may be raised directly to their business counterpart/contact person at the Group or through the relevant tip-offs anonymous hotline:

Southern African region:	0800 001 987
Americas region:	1 800 317 0287
European region	
Finland:	0 800 772 244
France:	0 805 080 544
Australian region:	1 800 633 293
FreeFax:	0800 00 77 88
FreePost:	KZN 138, Umhlanga Rocks, 4320
Website:	www.tip-offs.com
Email:	sibanyestillwater@tip-offs.com



Acknowledgment

By entering into a business relationship with the Group, Suppliers acknowledge that they have read, understood and agreed to comply with this Code.

Definitions

Artificial Intelligence

Artificial intelligence is a general-purpose technology combining computer science and robust datasets to enable problem solving. It simulates human intelligence processes with machines, especially computer systems.

Bribery

Bribery includes offering, giving, promising, requesting, authorising, and/or agreeing to receive or accepting money or anything of value, regardless of type, size, or monetary value as an inducement for an action which is illegal, unethical and/or a breach of trust by anyone.

Bribery can be motivated by different things. Examples include seeking to gain access to confidential information, trying to influence decision-making, attempting to obtain preferential treatment, or attempting to cover up illegal activity.

“Anyone” in this context includes, but is not limited, to:

- Officials of government, or government agencies, departments, or entities (including state-owned organisations engaged in commercial activities).
- Any individual or entity which solicits or requests a benefit.

Confidential Information

Confidential information encompasses all information of whatever nature and in whatever form not in the public domain and which has been or may be obtained by the Supplier by the examination, testing, visual inspection or analysis of any confidential information disclosed or through having been given access to the operations (including but not limited to market price sensitive information, personal information, technical, strategic, non-public financial or production reports, intellectual property, trade secrets, know-how, third party information, mergers and acquisition information and employee records/information) and includes any information that is proprietary or secret to the Group or which the Group considers as confidential, that might be of use to competitors, or that may be harmful to the Group or its customers and stakeholders if disclosed.

Conflict of Interest

A conflict of interest arises when an individual's self-interest (personal, family interest and/or loyalties) interferes, is perceived to interfere, or has the potential to interfere in any way with the interest of the Group. A conflict situation can arise when an individual takes actions or has interests that may make it difficult to perform his or her company work objectively and effectively.

Corruption

Corruption is “any act in which entrusted authority is directly or indirectly misused to obtain any form of gratification”. This includes bribery, nepotism, extortion, theft, conflicts of interest and fraud.



Discrimination

Discrimination is defined as the practice of unjust or prejudicial treatment of individuals or groups based on characteristics or attributes such as race, ethnicity, gender identity or expression, creed, national origin, colour, pregnancy, marital status, religion, age, disability, sexual orientation, conscience, beliefs, culture, language, birth, or other legally protected characteristic or attributes. It involves treating people less favourably or denying them equal opportunities, rights or privileges based on these characteristics or attributes.

Extortion

Extortion is a criminal offense of obtaining money, property, or services from another individual or institution, through coercion, threats, intimidation, or blackmail. It involves using fear, force, or the manipulation of information to gain a benefit or advantage at the expense of another individual or institution.

Glossary of Terms

Term	Referred to as
Sibanye-Stillwater	the Group
Suppliers, consultants, service providers, distributors or any other party involved in the supply chain.	Suppliers
Supplier Code of Conduct	Code