



POLICY STATEMENT

Responsible Sourcing of Platinum / Palladium

Sibanye-Stillwater adheres to the responsible sourcing of platinum and palladium as prescribed by the London Platinum and Palladium Market (LPPM). In order to ensure responsible sourcing, Sibanye-Stillwater is committed to the following:

- Systematically performing due diligence practices, following a risk-based approach, before entering a business relationship with any Platinum/Palladium counterparties.
- Conducting, utilising a risk-based approach, appropriate scrutiny and monitoring of:
 - the transactions undertaken through the course of the relationship;
 - and the governance structures in place to prevent any risk of illegal activities.
- Implementing a management strategy to respond to identified risks.
- Immediately suspending engagement with upstream counterparties where we identify a reasonable risk that they are sourcing from or linked to any party committing the serious offences where a risk mitigation strategy needs to be implemented.
- Immediately discontinuing engagement with upstream counterparties where we identify a reasonable risk that they are sourcing from or linked to any party committing the serious offences after failed attempts at mitigation within six months from the adoption of the revised risk mitigation strategy.
- Will not tolerate any direct or indirect support to non-state armed groups through the extraction, transport, trade, handling or export of minerals.
- Will not offer, promise, give or demand any bribes, and will resist the solicitation of bribes to conceal or disguise the origin of minerals, to misrepresent taxes, fees and royalties paid to governments for the purposes of mineral extraction, trade, handling, transport and export.
- To require evidence from our counterparties, in accordance with our position in the Platinum/Palladium supply chain, that they have disclosed payments in accordance with the Extractive Industry Transparency Initiative (EITI). Investigate the role of refiners in incentivising counterparties to operate in accordance with the EITI.
- Ensuring ongoing responsible sourcing training to be supplied to all Sibanye-Stillwater employees involved.
- Ensuring all payments are made via official banking channels or Platinum/Palladium transfers through accredited refiners. Sibanye-Stillwater has a zero tolerance to cash payments.

This policy is applicable to all personnel within Sibanye-Stillwater. Employees, counterparties, service providers and agents in the Platinum/Palladium responsible sourcing supply chain must adhere to this policy. Contractors and consultants are required to act consistently with this policy when performing services for Sibanye-Stillwater.

Neal Froneman

October 2021

Chief Executive Officer

