



POLICY STATEMENT

Responsible Sourcing of Metals

Sibanye-Stillwater recognises the risks of significant adverse impacts that may be associated with extracting, processing, trading, handling and exporting minerals. Sibanye-Stillwater recognises the need to combat systematic or widespread abuses of Human Rights, to avoid contributing to geopolitical conflict, to comply with high standards of anti-money laundering practice, and to combating Terrorist Financing practice. Towards these ends, we commit to adopt the policy on the Responsible Sourcing of Metals.

Sibanye-Stillwater's policy is designed to ensure that our engagements and operations are conducted in accordance with the Organisation for Economic Co-operation and Development Due Diligence Guidance for the Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (OECD DDG), including meeting responsible sourcing requirements derived from the OECD DDG such as the London Platinum and Palladium Market's Responsible Platinum/Palladium Guidance (LPPM RPPG), the London Metal Exchange (LME) Policy and the Conflict-Free Gold Standard (CFGS). 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 Metal supplying 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 refuse 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 Metal 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; and
- Ensuring all payments are made via official banking channels or Metal 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 Metal 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
Chief Executive Officer

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