

Responsible Production and Sourcing

Policy

June 2024

PLS-POL-SS-003

1 PURPOSE

The purpose of the Responsible Production and Sourcing Policy (the Policy) is to set out PLS Group Limited and its subsidiaries (PLS, the Group) commitment to ethical and responsible sourcing and production practices.

PLS does not operate in, or source materials from *conflict-affected or high-risk areas* (CAHRAs)ⁱ. PLS recognises the risk of significant impact associated with extracting, trading, handling, and exporting minerals from these areas.

2 SCOPE

This policy applies to all Directors, officers, and employees of PLS.

PLS will work with agents, suppliers, contractors, business partners and any other party acting for or representing the Group to act in line with this policy and share in these commitments.

3 COMMITMENT

PLS is committed to managing human rights, corruption, environmental, climate change and other risks through our procurement practices.

Should PLS source materials from CAHRAs, we commit to avoiding contributing to, or being associated with, significant adverse impacts in alignment with the *OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas* as follows:

3.1 HUMAN RIGHTS

PLS will not tolerate, profit, contribute, or commission any serious human rights abuses associated with the extraction, transport, or trade of minerals across our operations and supply chains including:

- Any form of torture, and cruel, inhumane, or degrading treatment
- Any form of modern slavery including compulsory or forced labour, worst forms of child labourⁱⁱ and human trafficking
- Other gross human rights violations and abuses such as widespread sexual violence
- War crimes or other serious violations of international humanitarian law, crimes against humanity, or genocide.

PLS will take immediate measures to responsibly suspend or discontinue engagement with entities, where we identify a reasonable risk that they are sourcing from, or linked to, any party committing serious abuses as defined above.

3.2 NON-STATE ARMED GROUPS

PLS will not knowingly provide direct or indirect support to non-state armed groups or their affiliates, public security forces, or private security forces who:

- Illegally control mine sites, transportation routes and upstream actors in the supply chain
- Illegally tax or extort money or minerals at point of access to mine sites, along transportation routes or at points where minerals are traded
- Illegally tax or extort intermediaries, export companies or international traders

PLS will take immediate measures to responsibly suspend or discontinue engagement with upstream suppliers where we identify a reasonable risk that they are sourcing from, or linked to, any party providing direct or indirect support to non-state armed groups.

3.3 SECURITY FORCES

Where PLS or any company we are procuring from engages public or private security forcesⁱⁱⁱ we will require such forces to be engaged in line with the Voluntary Principles on Security and Human Rights.

PLS will implement a risk management plan to prevent or mitigate the risks of direct or indirect support to public or private security force and responsibly disengage with upstream suppliers who fail to mitigate within six months of the adoption of this plan.

3.4 BUSINESS ETHICS

PLS will:

- Not offer, promise, give, demand, or accept any bribes to conceal or disguise the origin of minerals, or to misrepresent taxes, fees and royalties paid to governments
- Take steps and support efforts to eliminate money laundering
- Ensure that all taxes, fees, and royalties are paid
- Establish a system of controls and transparency over our mineral supply chain.

3.5 COMPLIANCE

PLS will:

- Communicate this policy to all relevant stakeholders
- Invest in responsible sourcing training across our procurement teams
- Maintain procurement systems and implement due diligence practices that align with responsible business practices.

POLICY HISTORY

This Policy will be reviewed by Management and the Board-level Sustainability Committee every two years and amended as required.

ESTABLISHED	19 June 2024
LAST REVIEWED	N/A
FREQUENCY	Every two years

i Conflict-affected and high-risk areas (CAHRAs) – Areas identified by the presence of armed conflict, widespread violence, including violence generated by criminal networks, or other risks of serious and widespread harm to people. Armed conflict may take a variety of forms, such as a conflict of international or non-international character, which may involve two or more states, or may consist of wars of liberation, or insurgencies, civil wars. High-risk areas are those where there is a high risk of conflict or of widespread or serious abuses as defined in paragraph 1 of Annex II of the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict Affected and High Risk Areas. Such areas are often characterised by political instability or repression, institutional weakness, insecurity, collapse of civil infrastructure, widespread violence and violations of national or international law.

ii Refer to ILO Convention No. 182 on the Worst Forms of Child Labour (1999)

iii Public security forces refer to state military, police, or other security personnel employed by the government. Private security forces refer to private security companies or private military/security contractors that provide armed or unarmed guarding services on a commercial basis.