

## StoneX Metals Ltd: Compliance and Ethics Policy

### 1. Introduction

It is the declared policy and practice of StoneX Metals Ltd ("**SML**") to maintain in all its business relations and activities dealing in precious metals, in particular in the field of precious metal sourcing, to high standards of ethical conduct, to comply with all applicable laws, to exercise full transparency of our transactions, and engage only with persons and/or companies who themselves abide by laws and ethical principles. Furthermore, we are strongly committed to only source precious metals from operations in conformance with internationally accepted human rights and environmental practices, to ensure not to degrade human rights or the environment.

### 2. Applicability and Responsibility

This policy is applicable to the entire organisation and all business, including representatives and other organisations over which SML has control.

We expect from all our employees, officers and directors to comply with this policy. We provide regular training and ensure that all of these persons learn and comply with company standards and laws applicable to their job responsibilities, and to adhere to the guiding principles of this policy, encouraging them to raise any suspicious relation and/or transaction to management and/or compliance officer immediately. We guarantee the actuality of our policy by periodic reviews and ensure the implantation by elaborating specific codes and procedures, effective communication, training and regular monitoring.

### 3. Commitment

In addition to adherence in our home country, United Kingdom, to the The Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations 2017 and subsequent amendments, we apply the same principles expressed in this policy, throughout the world, whenever and wherever we operate and does business. We are, however, aware of and recognise that there are differences in laws and standards throughout the world, and that a single rigid code of conduct will not fit all circumstances. The principles of honesty, fairness and high ethical standards will never and, for no reason, be compromised.

We are also aware of, and recognise, that in some parts of the world governments are weak, possessing poor legal ethical infrastructures, and that sometimes-armed conflict takes place. We will not, under any circumstances, engage in business that arises from illegal activities, tax fraud/evasion, or that is used to finance criminal or terrorist activities (OECD Due Diligence for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas: Second Edition). However, following the guidance of the United Nations, we will not simply embargo such areas; we will not unthinkingly deprive them of our technical and financial expertise, and of the opportunity



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to improve their situations through legitimate, transparent trade. We will, instead, exercise particular diligence to uphold this policy.

StoneX Metals Ltd has committed to abide by LBMA’s Responsible Silver Guidance and the LBMA Global Precious Metals Code.

For further information on our Code of Conduct, and our due diligence process please don’t hesitate to contact us.

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