

StoneX Metals Ltd: Environmental, Social and Governance Policy

1. Introduction

This Policy outlines StoneX Metals Limited's ("**SML**") framework for supporting global efforts and fostering active collaboration with suppliers and stakeholders to ensure that precious metals are ethically sourced. This commitment is embedded within our Responsible Sourcing Policy, which is aligned with SML's Environmental, Social, and Governance (ESG) Policy.

Our supply chain due diligence, along with our aligned commitments, policies, and practices, adhere to the five-step framework of the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas, as well as the three-step ESG framework requirements of the LBMA Responsible Sourcing Performance Programme. These are detailed below:

Step 1: SML's responsible supply chain due diligence includes a policy encompassing ESG requirements. Under this step, SML enhances ESG engagement with silver suppliers and, where feasible, supports silver supply counterparties in building their due diligence capacities. This includes addressing concerns such as the use of mercury in artisanal and small-scale mining ("**ASM**"), with the expectation that SML assists in establishing processes to eliminate its use.

Step 2: SML assesses risks within the supply chain, including the environmental policies and practices of suppliers, covering both ASM and large-scale mining ("**LSM**") operations.

Step 3: Following the risk assessment, SML implements a management strategy to address identified ESG risks. SML also provides evidence of its sustainability policy and its impact on associated initiatives throughout the supply chain.

2. Environmental and Social Standards

2.1 Assessment and Management of Environmental and Social Risks, and Impacts

SML defines the responsibilities for assessing, managing, and monitoring environmental and social risks and impacts at each stage of the supply process. These efforts aim to achieve outcomes consistent with its Environmental and Social Standards ("**ESS**").

2.2 Labour and Working Conditions

SML acknowledges the importance of employment creation and income generation in reducing poverty and promoting inclusive economic growth. Suppliers are encouraged to foster positive worker-management relationships and enhance the benefits of a project by treating workers fairly and ensuring safe, healthy working conditions.

2.3 Resource Efficiency, Pollution Prevention and Management

SML recognises that economic activities and urbanisation often result in pollution affecting air, water, and land, and consume finite resources, potentially threatening ecosystems and communities at various levels. This ESS establishes requirements for addressing resource efficiency and pollution prevention throughout a project's life cycle, including requesting environmental policies and/or certifications from suppliers within the supply chain.

2.4 Community Health and Safety

SML identifies and addresses health, safety, and security risks impacting communities affected by projects. Suppliers are responsible for avoiding or minimising these risks, with particular focus on individuals who may be vulnerable due to their specific circumstances.

2.5 Land Acquisition, Restrictions on Land Use and Involuntary Resettlement

Involuntary resettlement should be avoided wherever possible. When unavoidable, it should be minimised, with carefully planned measures to mitigate adverse impacts on displaced persons and host communities receiving them.

2.6 Biodiversity Conservation and Sustainable Management of Living Natural Resources

SML emphasises the protection and conservation of biodiversity and the sustainable management of natural resources as key elements of sustainable development. This ESS addresses the management of habitats, including forests and biodiversity, while considering the livelihoods of affected parties, including Indigenous Peoples, whose access to or use of natural resources may be impacted by a project.

2.7 Biodiversity Conservation and Sustainable Management of Living Natural Resources

SML ensures that development processes uphold the human rights, dignity, and cultural identity of Indigenous Peoples and Sub-Saharan African Historically Underserved Traditional Local Communities. This ESS aims to avoid adverse project impacts on these communities, or, where avoidance is not possible, to minimise, mitigate, or compensate for such impacts.

2.8 Cultural Heritage

SML recognises the importance of cultural heritage in connecting past, present, and future. This ESS includes measures to safeguard cultural heritage throughout the project life cycle.

2.9 Financial Intermediaries

SML acknowledges that robust domestic capital and financial markets are crucial for economic growth and poverty reduction. Financial intermediaries are required to monitor and manage the environmental and social risks of their portfolios and subprojects. Portfolio management approaches will vary depending on the FI’s capacity and the nature and scope of funding provided.

SML values open and transparent engagement between suppliers and stakeholders as a cornerstone of good international practice. Effective stakeholder engagement enhances environmental and social sustainability, improves project acceptance, and contributes significantly to successful project design and implementation.

StoneX Metals Ltd
Argentor House
Oldbury Rd
West Bromwich
B70 9BS

Production Date	February 2025
Version.	2025
Replaces	N/A
Author	SML Compliance
For questions contact	SMLCompliance@stonex.com