

StoneX Metals Ltd: Supply Chain Grievances & Whistleblowing Policy

1. Introduction and Scope

This Policy provides framework for receiving, investigating & responding to grievances, promoting mutual confidence & trust with all relevant parties. Its application relates to collective & individual grievances/complaints. Those raised are inclusive of both external & internal allegations. All evidenced grievances/complaints shall be investigated. In accordance with the UK Public Interest Disclosure Act 1998 (“**PIDA**”), staff making protected disclosures will not suffer any detriment for making disclosures in the public interest.

This policy applies to StoneX Metals Ltd (“**SML**”) only. Protected disclosures submitted to SML in relation to StoneX Financial Ltd or another StoneX Group entity will be forwarded to those companies to be processed under the relevant policies and procedures for those entities.

2. Incident Report Guidance

Any whistleblower wishing to raise a complaint/grievance must adhere to the following reporting guidance that provides information on how to report an incident to facilitate its resolution.

3. Definition of Malpractice

This Policy encourages the reporting of any abuses, risks &/or behaviour that does not comply with the authorities, or Company Regulations, including but not limited to, the following:

- Corruption/Bribery.
- Fraud.
- Property Damage/Theft.
- Employee Misconduct.
- Health & Safety Violations.
- Inadequate Working Conditions.
- Inadequate Security (People, Metal, Property).
- Environmental Impacts.
- Child Labour.
- Human Rights Violations.

4. Anonymity

Individuals making protected disclosures do not need to disclose their identity in order to make a disclosure. However, information & evidence needs to be of a sufficient level to enable the substantiation of any claim.

5. Evidence

Information provided must include, whenever possible/applicable:

- Name(s) of affected person, community &/or organisation;
- Factual description;
- Witnesses;
- Date;
- Time;
- Location; and
- Identity of buyers of minerals from the stated location.

As insufficient information may hinder any prevalent investigations, please provide as much information as possible.

6. NGO Reports

When informing SML of incidents pertaining to a supply chain in which we are involved, please include:

- clear research methodology highlighting your educational & professional experiences
- precise locations as to where the research was conducted & include those of which who were interviewed
- accurate referencing to all sources with correct & accurate dates.

Wherever possible, sources must avoid being concentrated, as to avoid weakly supported reports. Should confidentiality of sources be of concern, an appropriate system to mask, but still link them, should be adopted.

Victim viewpoints should be included wherever possible, ensuring protection of all vulnerable interviewees in the process. Lastly, it's vital that information generating a link to the actors within the supply chain need to be established to aid in such reports, specifying where the incident took place, or who the trader/exporters were, or if any actors were members of a cooperative (with specifics to which one), and so forth.

7. Internal Reporting

SML encourages the reporting of internal grievances/complaints to the employee's line manager relevant manager. Should this not be possible/appropriate, then grievances/complaints can be filed through the formal whistleblowing channels set out in Section 8.

8. Formal Reporting

- Any whistleblower may make protected disclosures via the Employee disclosures: StoneX EMEA Whistleblowing Portal [link].
- External disclosures may be emailed to SMLCompliance@stonex.com, or mailed to:

StoneX Metals Compliance Department
StoneX Metals Ltd
Argentor House
Oldbury Lane
West Bromwich
B70 9BS

9. Case Management

Upon receiving a report, the following steps will be taken:

1. **Acknowledgment:** The whistleblower will receive an acknowledgment of their report within 5 working days.
2. **Assessment:** An initial assessment will be made to determine the scope of the investigation.
3. **Investigation:** A thorough investigation will be conducted, which may include interviews and the collection of evidence.
4. **Outcome:** The whistleblower will be informed of the outcome of the investigation, subject to confidentiality constraints.

10. Other Matters

Whistleblower Protection

SML is committed to ensuring that individuals who raise concerns in good faith under this Whistleblowing Policy are protected from any form of retaliation, victimisation, or disadvantage. Specifically, we provide for the following protections:

- **No Retaliation:** Whistleblowers will not face any disciplinary action, dismissal, or detriment, such as reduction in pay, changes to employment terms, or denial of opportunities for promotion or training, as a result of their disclosure.

- **Career Development:** Internal whistleblowers who report concerns will not suffer any negative impact on their career progression. Any actions that unfairly hinder their opportunities for promotion, transfers, or other career advancements will be considered retaliatory and subject to disciplinary measures.
- **Compensation:** There will be no adverse changes to an employee's salary, bonuses, or other forms of compensation because of their whistleblowing. SML will ensure that all compensation decisions remain unbiased and unconnected to the whistleblowing report.
- **Employment References:** Any employment reference requested for whistleblowers will be prepared without any bias or negative reflection on the individual's decision to report concerns. SML is committed to ensuring that references provided are objective, accurate, and free from retaliation.

These protections are provided in line with the relevant UK legislation, including the Public Interest Disclosure Act 1998 (PIDA). Any form of victimisation or retaliation by any officer, manager, or employee will lead to disciplinary action, which may include dismissal.

Data Collection

SML will ensure that all communication is recorded appropriately & tracked through to its closure/resolution. This information will include the:

- Relevant Senior Management/Department(s);
- Registration Date;
- Status – Open (Founded), Rejected (Unfounded) & Closed (Concluded)

Policy Review

This policy will be reviewed annually and updated as necessary to ensure it remains effective and compliant with relevant laws and regulations.

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