



# JBR Recovery Ltd

## Sustainability report 2023

### **Foreword**

Precious metals are indispensable and often enable technological transformation and innovation that is needed for humankind to create a more sustainable future. In pharmaceutical ingredients precious metals help to battle cancer, they eliminate bacteria and fungi, and on solar cells they enable efficient generation of renewable electricity. The effective production and use of green hydrogen relies on precious metal catalysts, and so does the cleaning of exhaust air. As impressive as precious metals are, they do also have drawbacks. The huge demand cannot nearly be covered by recycling, so mining is indispensable. However, the extraction and processing of precious metals is very energy- and carbon-intensive and can adversely impact workers, nature, and nearby communities. Substantial progress can only be achieved through collaborative efforts involving all key players, including miners, refiners, processors, and users of precious metals.

We cover the whole value chain from refining, trading, and processing value-added precious metal to recycling for silver.

We set rigorous standards for our own business and actively encourage the adoption of similar standards along the entire value chain. Our customer and supplier partnerships often last for many years and decades, and our long-term commitment to the precious metals industry is a decisive factor for our success.

I am convinced that the precious metals industry has great potential for a successful transition toward sustainability and that our dedication to responsible business practices will continue to attract like-minded customers and partners.

We strive to realise the potential of precious metals as responsibly as possible. With our first Sustainability Report we underline this commitment with our pledge to responsibility.

We pledge to systematically decarbonise our business where possible because the climate is precious to us.

We look for ways to conserve resources and promote a circular economy because resources are precious to us.

People are precious to us; we therefore prioritise the well-being and interests of our people, nearby communities, and people along our value chain.

We understand our sustainability efforts as a great opportunity to expand our business while being the sustainable and responsible in our business.

I believe that future business growth must and can only be achieved in a sustainable way. Our report shows our commitments and priorities. We are looking forward to an active dialogue with our stakeholder community.

**Simon Meddings Managing Director JBR Recovery Ltd**

## **About this report**

The world is changing, faster than ever. The need for sustainable practices has never been more pressing for ensuring the long-term viability of societies and businesses alike. We understand the challenges we face, and we are determined to make a difference. This report reflects our ongoing efforts to address these challenges head-on.

While we have come a long way, we also acknowledge that change takes time. We are still in the early stages of our sustainability journey, but we believe that challenges breed opportunities for innovation. By fostering a culture that embraces sustainability, we provide our employees with a platform to think creatively and find new, more sustainable solutions. We are integrating sustainability where possible into all our business processes, ensuring that it becomes part of our daily operations.

We strive to set targets that truly make a change—within our sites, throughout our value chain, within our industry, and beyond. This Sustainability Report showcases the progress already made and reflects the hard work and dedication of our employees, who remain the driving force behind our sustainability initiatives.

## **JBR Recovery Ltd**

### **Company profile**

JBR is a leader in silver end of use recovery and refining of LBMA Good Delivery silver bars and cover the value chain from trading to recycling end-of-life waste materials. We produce high quality refined silver bars that are essential for many industries, including but not limited to the automotive, chemicals, semiconductor, pharmaceutical, hydrogen, and jewelry industries. Our headquarters is located in Birmingham UK.

Trust and reliability, strict adherence to leading compliance standards, transparency, and financial stability are the foundation of our business. We value long-term relationships over short term profit, and our customer relationships often endure for years and decades. JBR strives to have an organisational

structure that enables fast decision-making processes and smooth and open communication that addresses every employee on every level.

## **Our guiding principles**

JBR's Guiding Principles are the cornerstone of our corporate culture. They serve as a general orientation and guide as to how we conduct our business. These principles define behaviors and mindsets that are essential for successful cooperation with our partners, customers, and within our company. We expect all employees to bring our core values to life and therefore work continuously to ensure their implementation and ongoing development.

**CUSTOMER FOCUS** We concentrate on our customers' needs.

**CLEAR LANGUAGE AND RESPECT** We communicate clearly and respect each other.

**DIVERSITY** We foster different perspectives and diverse teams

**CONTINUOUS IMPROVEMENT** We continuously want to get better.

**ACCOUNTABILITY** We are responsible for our success and failures.

**RESPONSIBILITY** We care about people and our planet.

## **Recycling and refining**

Global supply chains would not function without recycled precious metals, which supplement primary sources. JBR is a large recycler and refiners of silver, therefore contributing to environmental conservation.

Precious metals recycling has a much smaller environmental footprint than extraction. Its carbon emissions can be up to 98% lower. Our recycling business therefore helps to decarbonise our customers' value chain. In addition, it helps to bring down the costs for our customers and their own customers, as highly valuable metals are recycled and reused again and again.

## **Precious metal content determination**

Customers worldwide rely on our advanced equipment and expertise to precisely analyse their valuable material's precious metal content. Chemical and physical scientists and experts work in our analytics department, where our customers' prepared homogenised materials are analysed in a variety of well-established processes in accordance with industry standards for quality and materials. Our analytics services also include materials characterisation as well as survey, purity, and surface analysis. Precious metal logistics Shipments of waste materials containing precious metals must comply with state, national, and international laws and regulations. Decades of expertise enable us to guide customers through these complex requirements. JBR's door-to-door logistics, transportation, and pickup services ensure that valuable material is handled correctly and safely. Our extensive experience in waste declaration, permits, and regulations saves time and reduces customers' logistics costs.

## **Strategy our pledge to responsibility**

Precious metals foster a better world, precious metals are indispensable. They enable technological transformation and innovation needed for a more sustainable world. For example, silver is a key ingredient for the production and use of green hydrogen. Catalysts containing precious metals clean the exhaust of millions of vehicles or industrial processes worldwide. Pharmaceutical ingredients are used in medicines that treat cancer. Maximize impact, minimize harm We are proud of the positive impact our precious metal products have. The modern life we are all used to today would not be possible without them.

Therefore, we have a duty to realise their potential as responsibly as possible. As impressive as precious metals are, they do also have drawbacks. The huge demand for precious metals cannot nearly be covered by recycling, so mining is indispensable. However, the extraction and processing are very energy- and carbon-intensive and can adversely impact workers, nature, and nearby communities. That is why we work tirelessly to maximise the benefits of precious metals for people and the planet, while steadily reducing their negative impact. We want to maximise impact and minimize harm. Our pledge to responsibility Climate, resources, and people are precious to us. We pledge to always act accordingly: to systematically decarbonise our business, to always look for new ways to conserve resources and promote a circular economy, and to prioritise the well-being and interests of the people in our company, in nearby communities, and along our value chain.

Just as importantly, we expect the same from our business partners, both upstream and downstream. We are convinced that our industry can make a successful transition toward sustainability, but we can only achieve this by working together: from miners to refiners, processors, and users of precious metals. Our aim is to lead by example and to propel positive change in our industry. We set rigorous standards for our own business and actively encourage the adoption of similar standards along the entire value chain.

## **Sustainability governance**

Sustainability topics are embedded in our existing management structures and thus are integrated into our decision-making processes. This reflects the importance that JBR attaches to sustainability and ensures that they receive the same visibility as other considerations, such as earnings performance and financial situation. We have a dedicated governance set up for sustainability.

## **Senior executive compensation**

Overall compensation policy is defined by the board of directors. In line with this policy, the compensation at JBR includes an annual short-term variable incentive called performance bonus. It is based on the degree to which the company meets its targets for certain KPIs in a financial year, such as earnings before taxes or certain other KPIs including but not limited to Environmental and health and safety. This provides a clear monetary incentive to members of JBR's Lead Team. The achievement of these targets is assessed at the end of each financial year and determines the amount of variable compensation. Targets are set during the annual financial budgeting process.

## **Risk and opportunity assessment**

JBR faces several types of risks and opportunities resulting from its continually evolving business environment. These include finance, market, counterparty, technology, policy and regulation (especially related to climate protection), and social. We classify risks and opportunities by assessing their probability and the size of their potential negative or positive impact.

JBR's is assessing potential financial and strategic impact on the business for the aspects listed below, based on our corporate methodology.

The aim of this process:

JBR's own competencies .

technological changes .

market developments .

policy and regulatory environment .

industry benchmark .

social aspects .

climate-related and environmental risks and developments.

## **Environment**

JBR's solutions help protect the environment and climate. For example, our precious metal recycling uses far less energy than primary metal extraction. In addition, we work systematically to enhance our energy efficiency, produce less waste and recycle water use at our refinery where possible, our emissions are checked by the UK environment agency and we are proud to state we continually pass these inspections in adherence with UK emission targets.

Climate protection is one of humankind's biggest challenges. Precious metals are needed to propel the transition to a lower-carbon world: They play a key role in electrolyzes for the production of green hydrogen, wind turbines, solar panels, electric vehicles, and fuel cells, to name just a few.

Our vision is to be a pioneer in sustainability and to actively shape climate action. We act to promote positive change within our industry where possible, by working with upstream counterparties and utilising the LBMA responsible sourcing programme to aid in impacting upon the whole value chain in precious metals supply.

Our product and business models help reduce carbon emissions. For example, precious metal recycling dramatically reduces both energy use and carbon emissions compared with primary sourcing from mines. In fact, the carbon footprint of recycled precious metals is up to 98% smaller than that of primary precious metals, JBR predominately recycle precious metals in our supply chain.

However, we recognise that mining will remain crucial, as demand cannot be covered by recycling alone. We therefore have a responsibility to do our utmost in supporting the mining industry in its ongoing efforts to systematically reduce its adverse impacts.

In addition, hazardous waste from the use of chemicals in transformation and recycling processes poses a risk to the environment and to people if not handled appropriately. We work systematically to minimize this risk and mitigate any potential negative impact. We do this by continuously applying and revising our standards and processes for handling waste that arises in our production processes. Our first priority is always to avoid waste; where this is not possible, we strive to reuse or recycle it.

## **Waste management**

JBR has long had in place a circularity system for waste containing precious metals. All waste that arises during all processes, such as development, production, analysis, and filling, is first fed into our own recycling system. Our aim is always to recycle as much waste as possible ourselves and to only send it to third-party service providers as a last resort. This approach minimizes transport and thus carbon emissions. In the case of non-precious metal waste from our own operations, such as packaging and residues from our production, JBR works with certified environmental service providers. The various types of waste are separated to enable best possible disposal and circularity. We always dispose waste in accordance with legal requirements and standard operating procedures. Employees handling hazardous wastes are trained annually on waste separation and disposal.

## **Water**

Water plays an important role in our operations and processes. For example, it is needed as a solvent or adsorbent in our precious metal recycling processes. Like many refining companies, we produce wastewater that could have a negative impact on water quality if not handled properly. Therefore, in our recycling process we aim to reuse water and reduce its consumption and ensure proper wastewater treatment.

JBR always applies the highest standards in compliance with all applicable laws and regulations for managing and handling water and wastewater to mitigate potential impacts. We assess our water-related risks on the basis of the substances that wastewater could conceivably contain and take appropriate steps to mitigate these risks.

## **Our people**

Our employees are our most important asset. Their skills, knowledge, and dedication—as well as their diverse experiences and personalities, This chapter reports on three topics that we have identified as material: .

### **Diversity, equity, and inclusion**

JBR is committed to diversity, equity, and inclusion (DE&I). All three are vital parts of our identity and culture. We actively encourage different perspectives, put together diverse teams, and provide equal opportunity for everyone. We also insist on real cultural change toward a truly inclusive work environment. Moreover, we believe that DE&I is essential to our business success. Our diverse workforce can help us better understand our key markets and customers, generate more business opportunities, be more innovative, and enhance profitability.

Impacts Equal opportunity and non-discrimination are enshrined in the constitutions and laws of many countries. Nevertheless, JBR is well aware that marginalised groups—such as people of color and specific ethnicities or gender, the LGBTQIA+ community, people with disabilities, people with certain religious beliefs, and people with specific socio-economic and educational backgrounds—are often still systematically discriminated against and disadvantaged. To name just a few examples, representatives of these groups are less likely to have political representation, accumulate wealth, or hold a leadership position. We are very aware of this issue and therefore do everything we can to ensure that no inequalities or forms of discrimination that may exist in a country where we do business are replicated in our operations there. We view DE&I as an ongoing strategic initiative and work continually to become more inclusive, JBR have inclusivity training as part of their relevant employee training programme.

No cases of discrimination were formally reported in/to JBR during 2023.

### **Policies and regulations**

JBR endorses the principles set out in the UN Universal Declaration Of Human Rights, the UN Guiding Principles on Business, and the International Labour Organisation Core Conventions. Recruitment and promotion of gender and cultural diversity are essential factors in our recruiting and promotion processes. We implement measures to obtain a more diverse candidate pool. For example, we ensure that female and international applicants who meet the respective job requirements are represented in the candidate pool.

### **Job sharing and parental leave**

Offering employees flexible work arrangements is essential for improving gender diversity. JBR therefore after parental leave, management staff, regardless of gender, can return to the same or a comparable role, also part time wherever possible. We are also try to promoting and hiring employees during pregnancy and/or parental leave and provide extra support to new parents (mothers, fathers, domestic partners, adoptive parents).

## **Unconscious bias and inclusive leadership training**

To help promote an inclusive corporate culture, all relevant employees received external specialist training in unconscious bias and inclusivity training in 2023. This training was mandatory and involved all relevant employees with 100% completion rate. It conveyed the many benefits of diversity and reinforced awareness of unconscious bias and its adverse impact on leadership, team performance, and employee satisfaction. Participants also learned techniques for mitigating biases, putting inclusive leadership into practice, and promoting inclusion in order to foster an effective collaboration culture. From 2024 onwards, we will continue to provide training on unconscious bias.

## **Working conditions**

JBR is committed to providing a safe, respectful, and inclusive work environment in which all employees feel appreciated and can realise their potential. We comply with all relevant labor and occupational laws as a matter of course and offer competitive salaries and benefits. We do all this not only to show our appreciation for our employees' efforts but also to build loyalty and thus enhance retention.

The potential negative impacts of employment include unregulated working hours, unfair compensation, discrimination, unsafe working conditions, and the complete absence of employee representation. For example, long working hours and overtime can be a potential risk with an adverse impact for employees. JBR follows all government issued legislation for all its business lines and facilities to address each of these issues, from providing a safe and fair work environment to enabling employees to maintain a healthy work-life balance. We ensure all our employees have access to their country's social security system.

## **Organisation and responsibilities**

JBR HR and compliance oversees the development of our employment and training/education strategies and coordinates the implementation of all related measures, Strategic developments are periodically communicated to and discussed with the managing director and lead managers.

## **Policies and regulations**

JBR follows the Group employment policies, standard processes, and systems. In addition, we have also adopted many policies specific to own business needs specific to refinery and hazardous chemicals UK governmental legislation.

## **Raising concerns and complaints**

JBR has a grievance and whistleblowing policy, which is available to all employees and outside actors, this is publicly available on our website [www.jbr.co.uk](http://www.jbr.co.uk) where anyone can raise anonymously if they so wish concerning any issues to include supply chains and internal factors affecting all staff.



## **Occupational health and safety**

The health and safety of our employees is our top priority. We want our people to start each workday healthy and to end it without having been harmed in any way. We take many steps to foster the former and do everything we can to ensure the latter. Health and safety (H&S) at JBR starts at the top. Senior management expects the company's safety performance to meet high standards and to continually improve. In addition, we have in place H&S management systems certified to UK recognised standards. These, along with comprehensive policies, already give our organisation a robust safety culture. Nevertheless, we continually review our policies and practices—to look for ways to make our operating facilities and offices even safer.

JBR's processes could include potential harmful conditions like high pressures and temperatures, the handling of dangerous materials, or could create an explosive environment. Any type of injury adversely affects employees' health and quality of life; a severe injury could do so for a longer period of time (and possibly permanently) and may have an impact on employees' family members as well. For this reason, we are systematically working on ensuring proper precautions to provide a safe workplace with all our equipment. Moreover, workplace incidents may also cause production delays, make employees less motivated, or harm our reputation.

An occupational incident, particularly a severe one, is far less likely to happen in an office. But an office environment that is excessively stressful, not ergonomic, or not inclusive can have a negative impact on employees' health and well-being. This, in turn, could lead to more frequent absenteeism, lower job satisfaction, or other adverse consequences. A healthy, safe, and inclusive work environment can have a wide range of positive impacts, from increasing employees' well-being and satisfaction to enhancing our reputation and employer brand. That is why we are committed to providing our people with precisely such a work environment.

## **Hazard identification, risk assessment, and incident investigation**

We conduct H&S risk assessments for each of our workplaces, processes, machines, and hazardous materials. These take routine and non-routine activities into account and encompass all applicable H&S hazards: mechanical and electrical hazards, hazardous substances, and fire and explosion risks, to name just a few.

The assessments are conducted by a team consisting of at least the responsible manager in charge and an EHS expert (if relevant); employees are asked to provide input. The assessments' risk evaluation is used to define and implement preventive actions, whose effectiveness is monitored periodically. The aim of such actions is to eliminate hazards directly at their source. If this is not feasible, we put in place technical, organisational, and/or personal measures to effectively mitigate hazards. The findings and actions are also checked by the manager in charge, who ensures that they are communicated to employees.

## **Work-related injuries**

Reportable incidents include not only injuries, illnesses, and process safety incidents (such as spills, fires, explosions, or loss of primary containment), but also unsafe situations and near-miss incidents.

Investigations define preventive and corrective actions that are implemented using the respective action plan. Findings are shared with employees at the facility. (see annex 1)

## **People in our value chain**

One central and core element of our philosophy is to treat all of our employees with dignity and respect. However, our sphere of influence extends far beyond our direct workforce. We are aware of the significant impact our business has on many individuals along our value chain and recognise our responsibility for their welfare, and especially for the protection of their human rights. Therefore, our value chain management assesses our precious metal suppliers' social and environmental performance, we want to constantly strengthen our governance processes and our due diligence practices in the years ahead.

The majority of our procurement comprises precious metals, derived predominately from recycled material from secondary sources or in a smaller way from mined primary material, For this reason, their impact in particular is material for us. Consequently, our ambitions and measures described in this chapter focus closely on the impact that the extraction, processing, and handling of precious metals has in our upstream value chain.

We utilise LBMA responsible sourcing guidance toolkit to aid us in this, Working conditions in extractive industries are particularly challenging. For example, artisanal and small-scale mining (ASM) remains largely informal. Its workers are therefore particularly vulnerable, and there is an increased risk of a lack of labour rights and social protection. at present JBR does not source from ASM or CAHRA listed countries.

But even at large-scale mines operated by corporations, working conditions, especially in conflict-affected and high-risk areas (CAHRA), may not comply with our standards. Gender equality and inclusion often remain difficult to address as well. A further major topic regarding mines is their impact on the surrounding environment, therefore, we will draw on all available information from all major actors in the supply chain, apply strict standards in defining CAHRA countries, and derive responsible consequences for our business.

We understand that impacts from metal mining pose risks to the basic economic, social, environmental and/or cultural rights and to the interests of affected communities. Such communities as well as indigenous people may be impacted by competition for access to local energy or water resources, air and water emissions, waste from operations, and strain on local health services, to name just some examples. Indigenous people are in some cases more vulnerable and face greater obstacles when defending their unique rights and interests. Mining activities often operate in zones of conflict in resource-rich areas which are under socially repressive regimes or where conflict or political instability subsequently emerges. Business activities in such areas have implications that in extreme cases could include violations of human rights. We are fully aware of this and therefore have already had policies and procedures in place for many years to avoid potential negative impacts as far as possible. We will not work with mines that are linked to child labor or violations of human rights. In line with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from CAHRA, we would suspend all business relationships at the first sign of suspicion.

Afterwards, we seek for clarification of the situation and develop, if necessary, a corrective action and remediation plan with our mining partners. If there is neither the possibility nor the will to take corrective action, we would terminate the business relationship with zero tolerance. However, we know that terminating business relationships has a potentially adverse impact on people in the immediate surroundings. Mining often also comes with positive impacts for local and indigenous people by creating jobs, stimulating economic growth, supporting social development programs, and providing infrastructure development. Actively engaging with our stakeholders on the spot as well as implementing corrective measures in line with our zero-tolerance policies and practices is the only way to make a positive impact. We will continuously review our processes and adapt them to ensure that they meet our high standards. This demonstrates our ongoing commitment to improving the situation of the workforce in our value chain.

JBR applies the strictest industry standards for all metals, regions, mining partners, and customers worldwide. These go beyond regulatory requirements. Our aim is to promote the adoption of these rigorous standards worldwide in our supply chain and to help improve all ESG dimensions in countries of origin.

### **Collaboration with silver supplying partners**

We know that engaging with our stakeholders has the greatest impact to improve the living conditions of the workers in our value chain. We are convinced that the impact of our due diligence in conjunction with LBMA responsible silver guidance. We strongly believe that we can only create a positive impact by collaboration. We will actively engage with the most vulnerable part of the precious metal supply chain.

### **Policies and regulations**

JBR's responsible silver guidance;

JBR's Human rights policy and Supply chain due diligence policy, are based on the following:

the Universal Declaration of Human Rights;

the International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work ;

the UN Guiding Principles on Business and Human Rights;

the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas; including Annex II

the LBMA responsible silver guidance version 2;

### **Organisation and responsibilities**

Our Compliance department is responsible for defining our compliance strategy, establishing policies and procedures for governance, and overseeing their implementation. It is independent of business functions like sales and reports any suspicions of non-compliance directly to the senior management. Compliance department make strategic sourcing decisions such as suspending or closing market players and selectively accepting high-risk precious metal customers or partners, approve specific measures such as

enhanced due diligence and incident mitigation, and oversee their implementation. High-risk topics or exceptions are always communicated to and approved by senior management.

## **Human rights due diligence**

JBR takes all humanly and technically possible steps to ensure that the precious metals in its value chain originate from legal and responsible sources. We do the same to make sure that these metals are not associated with crime, armed conflict, or human rights abuses and that they are not connected with money laundering, terrorism financing, tax evasion, fraud, or any other crime. Therefore, we systematically adhere to the strictest standards in all jurisdictions for all metals and materials and also meet regulatory and industry standards for certain metals and materials. This includes, among others, the OECD Guidelines and the LBMA Responsible Silver Guidance and UK legislation.

## **Objectives of human rights due diligence**

Human rights due diligence is an integral part of JBR's general due diligence process. Its objectives are: to identify and assess the risk of human rights violations .

to manage the negative impact of identified risks by drawing consequences if the impact is a direct or indirect consequence of our activities, such as: engaging in mitigation and correction measures or, as a last resort, terminating business relationships.

Monitoring observance of human rights JBR has put in place a due diligence process to verify the observance of human rights by its precious metals suppliers, mining partners, and recycling business partners in the precious metal value chain.

This process consists of the following steps:

documenting all business partners that deal with, buy, or supply precious metals in any way .

informing contracting partners of applicable JBR's human rights policies and responsible sourcing programme.

updating information regularly and with increased scrutiny based on current developments (regularly updated CAHRA list) .

using document analysis to verify contracting partners' compliance with local human rights laws .

screening all information for irregularities regarding managers and owners, plausibility, listings of any kind, registration, type, form, and origin of metals and the expected quantity .

rating business partners according to their risk profile .

conducting on-site mine audits typically every three years or depending on risk assessment and, if possible, conducting interviews with employees to assess their work situation and workplace conditions unless independent third-party reports are available on issues such as occupational safety, child labor, forced labor, payment of adequate wages, granting of freedom of association, sustainable resource management, anti-discrimination and equal opportunity, or compliance with applicable environmental laws and regulations .

verifying incidents with regard to human rights violations in connection with our mining partners, and working with these partners to define and implement local remediation measures in accordance with the OECD Guideline .

asking for third-party audit reports in line with industry standards for mines .

asking for customer and partner due diligence processes and policies such as CAHRA definitions, and assessing their appropriateness .

refusing to enter a new business relationship, or terminating an existing relationship, if violations are detected that cannot be resolved or corrected and that are inconsistent with JBR's principles.

Frequency of human rights and environmental due diligence checks

JBR conducts human rights due diligence, which is part of the aforementioned monitoring process, before entering into new business relationships. We repeat our due diligence checks and investigations over the course of a business relationship at intervals commensurate with the respective risks or whenever changes regarding the risk of human rights violations become known. We used a questionnaire to screen 100% of our new precious metal suppliers on social and environmental criteria in 2023.

In our regular monitoring, we identified zero actual or potential negative social and environmental impacts from all our suppliers checked in 2023.

## **Business Conduct**

We know that the trust of our employees, customers, business partners, and other stakeholders is the basis for our success. We have zero tolerance of corruption and unethical business practices. Compliance with laws, regulations, and company policies is integrated into our business processes. The three main facets of our approach to compliance are prevention, detection, and response, with prevention being our top priority. We continually refine our compliance practices to ensure that they are effective and up to date and audited annually.

## **Compliance and integrity**

JBR has an employee handbook in place since ,as a guideline that is binding for the entire company, it also applies to everyone working for JBR. Its principles reflect our high standards of integrity, forthrightness, and responsibility, which we believe are essential for our long-term business success, we also adhere and implement the LBMA global precious metals code.

Violations of the Code are taken very seriously and may result in disciplinary action, including termination. JBR complies with all applicable national and international laws and regulations. This applies to all national, multinational, and supranational foreign trade regulations as well. All employees are obliged to comply with applicable export and import prohibitions, official approval requirements as well as relevant duty and tax requirements. In addition, we endorse the Universal Declaration of Human Rights and abide by the regulations of the organisations of which we are a member.

A large part of our business is the trading, processing, and recycling of precious metals. Therefore, our ambitions and measures describe in the following chapter focus strongly on the potential risks of misconduct that may be associated with precious metals. Impacts procuring and processing precious metals brings with it the possibility of misconduct and negative impacts. In particular, conducting business with silver mining companies that operate in conflict-affected and high-risk areas (CAHRA) poses several potential risks, such as corruption. In addition, precious metal transactions pose the risk of money laundering.

JBR is aware of these hazards, does not tolerate such behavior, and has established policies and procedures to combat corruption as well as child labor and other unethical practices.

## **Organisation and responsibilities**

All management levels and employees of JBR are responsible for combating corruption and money laundering, safeguarding human rights, and ensuring fair competition. Internal communications, company guidelines, and periodic training reinforce employees' awareness of anti-corruption and their responsibility to report suspected violations as well as concerns.

We have two main reporting paths for compliance issues. In the first, the Compliance team at the site where a report was filed investigates it and informs senior management.

At each level of hierarchy, compliance officers and management work together closely. Policies and regulations In addition to the employee handbook mentioned above, a number of further JBR policies and procedures apply. These were adopted by the board and introduced by JBR Compliance Officer. They include a human rights policy and a supply chain due diligence policy and reflect the JBR's and our own commitment to due diligence, the precautionary principle, and respect for human rights. We provide these policies to our business partners, to clearly outline our principles and expectations. They are also available on our website.

## **Anti-Bribery and corruption**

Anti-Bribery and corruption policy is binding for employees and managers at all levels and functions of JBR. They are a regular part of training, such as the general compliance eLearning module developed by the compliance officer . Additional annual training is offered to staff in functions with a higher risk of exposure to corruption, such as procurement, sales, or recycling. Our precious metals business all around the world is governed by strict local and international legislation.

## **Precious metal supplier and mining partner monitoring**

As stated any engagement with partners in CAHRA countries would require even stricter supplier and mining partner onboarding that as a minimum meets and in most cases surpasses internationally recognised industry standards, such as the LBMA responsible sourcing guidance. After onboarding, precious metal suppliers are subject to continuous monitoring, periodic Know Your Customer (KYC) updates, and site inspections conducted by senior JBR management or independent auditors. In addition, JBR has set up a system for the continuous monitoring of our precious metal suppliers, which includes constant screening via platforms like creditsafe as well as market intelligence and contacts with the relevant stakeholders.

## **Progress and measures**

JBR has in place measures to ensure compliance with its policies and rules and to prevent adverse impacts. JBR and their Compliance Officer train for and discuss all relevant topics on an ongoing basis with senior management and investigate potential incidents to prevent negative impacts.

There were no known significant instances of non-compliance with laws and regulations at our sites in 2023. Although we will of course remain vigilant, we believe this indicates that our efforts to ensure compliance are working.

## **Ensuring fair competition**

JBR expects its employees to comply with all applicable laws aimed at ensuring fair and open competition. Legislation strictly prohibits agreements or concerted actions with competitors regarding prices and terms, market and/or customer apportionment as well as unfair practices. Sharing sensitive market-related, in particular strategic information, with competitors is prohibited. Combating corruption prohibits all forms of direct or indirect bribery of, and undue favors to, business partners and public officials.

## **Combating money laundering**

JBR is determined to prevent itself from being exploited for illegal purposes, in particular for money laundering, criminal tax evasion, terrorist financing or other fiscal offenses. Our Guideline for the Prevention of Money Laundering and our Sustainable Sourcing Guideline set internal standards for the selection and monitoring of customers, suppliers, and mining partners, in part to prevent money laundering.

We annually engage independent auditors to confirm our compliance with the standards of the LBMA Responsible silver guidance.

## **Freedom of association and collective bargaining**

All employees are free to set up or join trade unions or equivalent representative organisations and to exercise their right to collective bargaining as provided by the labor laws of their respective countries.

## **Communication of grievances or issues with supply chain , whistleblowing policy.**

Employees and actors in our supply chain can report suspected violations or concerns via our whistleblowing policy, they can contact compliance or senior management directly if they have any grievance or issue via our whistleblowing policy procedures, this can additionally be made anonymously if required. 2023 has seen no incidents reported.

## **Reporting profile**

This is JBR's first Sustainability Report. It makes good on our promise to report on our sustainability strategy, targets, and initiatives transparently and on a regular basis. The report is aimed at our various

internal and external stakeholders, including our employees, customers, contractors, enterprise partners, and suppliers as well as policymakers, non-governmental organisations, and the public at large.

## **Structure and content**

The report's purpose is to describe our most important sustainability topics, our approach to managing them, and the progress we made in the reporting period. This Sustainability Report was commissioned by the managing director of JBR Recovery Ltd.

Version 1.0 December 2023



Annex 1:

Accident reports 2022 and 2023





