

JBR Recovery Ltd



The LBMA Responsible Silver Guidance has been established for Good Delivery Refiners to adopt high standards of due diligence in order to improve silver supply chains and combat systematic or widespread abuses of human rights, to avoid contributing to conflict, to comply with high standards of anti-money laundering & combat terrorist financing practice to improve environmental, social and governance issues within our supply chains.

This report summarises how JBR Recovery Ltd (JBR) as a Good Delivery Refiner has complied with the requirements of the LBMA Responsible Silver Guidance and responsible sourcing programme.

Refiners Details	
Refiners Name	JBR Recovery Ltd
Location	Argentor House, Oldbury Lane, West Bromwich, B70 9BS, United Kingdom
Reporting Year-End	March 2024
Senior Management Responsible for this report	Simon Meddings — Managing Director simon.meddings@jbr.co.uk

Step 1: Establish Strong Company Management Systems

Compliance statement with requirement:

JBR has fully complied with step1: Establish strong company management systems.

Has the refiner adopted a supply chain policy regarding due diligence for supply chain of silver??

JBR has adopted a strong policy regarding due diligence for supply chains of Silver for its reposting within our company structure to include all relevant factors of our businesses.

We apply Responsible Supply Chain Policy based upon our company policy of Compliance and Ethics. The supply chain policy has been formulised during the last

reporting year and is compliant with Annex II and 5 step framework of the OECD Due Diligence for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas.

This policy sets out our full commitment to:

Fight human rights abuses associated with extraction, transportation and trade of precious metals. Systematic or widespread human rights abuses associated with the extraction, transport, or trade of silver, including:

- Any forms of torture, or inhuman and degrading treatment
- Forced or compulsory labour
- Worst forms of child labour
- Widespread sexual violence or other gross human rights violations

War crimes, crimes against humanity or genocide.

Direct or indirect support to illegitimate non-state armed groups, or public or private security forces (“illegitimate non-state armed groups, public or private security forces”)⁷ which:

- Illegally control mines, sites, traders or other intermediaries, and transport routes through the supply chains; or

Illegally tax or extort money or minerals through the supply chains. Bribery and fraudulent misrepresentation of the origin of silver. Non-compliance with taxes, fees, and royalties due to governments related to mineral extraction, trade, and export from Conflict-Affected and High-Risk Areas (CAHRAs). Money laundering or terrorism financing and Contribution to conflict.

To mitigate the risk of money laundering, terrorist financing, conflict financing and responsibility as noted above to conduct systematic risk-based due diligence over our supply chains.

JBR address the ESG factors in their primary silver supply chain by making enquiries on policies and practices for the ESG factors noted below, and by using the LBMA Refiners Toolkit. ESG considerations are risk based to reflect the nature, size, and complexity of the counterparty.

Compliance with environmental, health, safety, and labour regulation in country of operation and/or company policy.

Environmental management, including: (but not limited to)

- Air, water, land pollution and incident management plans
- Water stewardship, especially in water scarce and stressed areas

Unauthorised sourcing from World Heritage Sites and Protected Areas.

Storage, handling, and disposal of hazardous chemicals, including mercury and cyanide.

Note: LBMA recognises that mercury is used mainly in Artisanal and Small-Scale Mining (ASM) sources and therefore does not ban such supply chains. Instead, LBMA requires Refiners working with such artisanal supply chains to assist them in establishing processes to use mercury in a safe manner and to limit negative impacts on the environment and health and safety, and to find alternative solutions to mercury.

JBR will engage with upstream producers to encourage them to comply with the International Cyanide Management Code.

Management of labour issues, including remuneration, working hours, collective bargaining, discrimination, diversity, disputes and safeguarding of workers.

Community engagement and management programmes (land acquisition and community resettlement, cultural heritage sites and indigenous people, closure planning and safeguarding of vulnerable populations).

The policy (or supporting process documentation) will include sufficient details on the silver supply chain due diligence.

Minimum criteria for internal(or external) supply chain document:

- Scope
- Organisation and responsibilities
- Identification and assessment of threat finance risks and consideration of ESG factors, including all those defined above Detailed and meaningful Know Your Counterparty (KYC) and supply chain due diligence processes that, at a minimum, meet RSG Step 2.1 requirements.
- Transaction monitoring processes that, at a minimum, meet RSG Step 2.1 requirements.
- Criteria for high-risk supply chains that, at a minimum, meet RSG Step 2.2 requirements.
- KYC and supply chain due diligence record maintenance requirements Employee training programme.

To screen and monitor the transactions and governance structures in place of our suppliers and to maintain adequate records of their due diligence documents and supply chain traceability, we require all old and new clients to confirm they also do not allow supply's to source from such areas of high risk.

To ensure on-going training of our staff involved in the supply chain.

Our environmental, social and governance policy enhances our considerations the priorities of these factors to our stakeholders, upstream and downstream per step 1.1 of the responsible silver guidance (V2).

These policies and procedures are approved at senior management and updated and reviewed annually or when circumstances require, these are available to read via our website www.jbr.co.uk .

Has the refiner set up an internal management structure to support supply chain due diligence?

JBR has set up an internal management structure to support supply chain due diligence.

We have efficient internal management system which main effort is to embed the supply chain due diligence into every structure and process to define the governance, roles, responsibilities, internal audit and communication. The managing of the due diligence process is clearly defined. The Compliance Officer is assigned with the right competence, funds and knowledge to manage the entire process and report directly to senior management on a regular basis. Senior management(Managing Director) have

sufficient skills and experience to also include training for oversight of responsible sourcing activities.

Communication with senior management is undertaken on a monthly basis and ad-hoc times, when necessary, to ensure new highlighted risks can be adequately managed to stakeholders such as employees and counterparties. This communication process is documented to include but not limited to, the information shared and whom with to include how and when the updates were communicated.

100% of relevant employees and board of directors are trained on supply chain due diligence and anti-money laundering and terrorist financing risks.

Where relevant we shall list instances when due diligence issues related to internal processes have been escalated to senior management and whether internal sanctions (e.g., warning/ penalties) have been taken these are reviewed by senior management who will impose any sanctions or penalties, the compliance officer shall report how effective these have been on review.

In this reporting year, no instances have been noted and no cash transactions are undertaken (company policy).

Has the refiner established a traceability system over silver supply chains, including chain of custody mapping (where relevant) and identification of supply chain actors.

JBR has established a strong internal system of due diligence, controls and transparency over silver supply chain.

We have adopted a robust receipts process, specific documents to include but not limited to sales invoices, transportation information, airway bills, environmental certification for hazardous materials (if relevant) must be received and transactional details entered before we process the silver bearing material. Each lot is accurately registered in our transactional data base system. Specific controls are carried out before processing the material, JBR organises regular training for relevant persons involved in this process to make sure guidelines are followed and respected no new employees have undertaken full training in respect to JBR policies and procedures in this financial year. Any form of non-conformity is unacceptable and must be reported to the site manager, Compliance Officer and/or Senior management.

Ongoing monitoring of JBR's policies and procedures is undertaken by the compliance department monthly and at ad hoc timings if risks are raised in certain areas, during this financial reporting year no incidents relating to counterparties identification, origin or traceability of silver or high-risk incidents have been reported. We continually look to improve due diligence with our suppliers and share our policies and procedures with all new & existing counterparties

Has the refiner strengthened company engagement with silver supplying counterparties, and where possible, assisted silver supplying counterparties in building due diligence capabilities?

JBR has strengthened company engagement with silver supplying counterparties, and where possible, assisted silver supplying counterparties in building due diligence capabilities.

We make our responsible supply chain policies and procedures publicly available to our supply chain actors through email and availability on our website (www.jbr.co.uk), we allow access to and encourage these actors' partners and suppliers access and use of these responsible sourcing policies and procedures.

JBR does not buy or refine precious metals from a state-owned enterprise nor make first-trade payments to such enterprises, if this is to change JBR will support and implement EITI Principles as part of our responsible sourcing procedures.

Has the refiner established a company-wide confidential grievance mechanism?

JBR has established a company-wide confidential communication mechanism to promote broad-based employee and stakeholder participation and risk identification escalation to senior management.

We have implemented whistleblowing and grievance policy which provides any interested party internal or external to voice confidential concerns regarding the circumstances of silver extraction, trade, handling and export in conflict-affected and high-risk areas and any other perceived risks to the supply chain. Reports can be made via differing methods, email, post or face to face and anonymously if preferred. This reporting structure and process can be found at www.jbr.co.uk policies and procedures, responsible sourcing policy document section 3.

JBR have received no relevant grievances during this reporting year.

Step 2: Risk identification and Assessment

Compliance statement with requirement:

JBR has complied with step 2: Identified and assessed risks in the supply chain

Does the refiner have a due diligence process to identify risks in the supply chain?

JBR identify and assess risks for every supplier, we have established a client database and allocate a risk profile accordingly, the process is a formal requirement before entering any business relationship and accepting any silver bearing material prior to full onboarding procedures with a supplying counterparty. Our due diligence process is carried out on a risk-based approach.

We use modelling techniques to map our KYC process which are used as a reference to identify possible risks and to mitigate these risks to the supply chain from point of origin to arrival at the refinery, additionally utilising 3rd party checking via Creditsafe.

KYC checks are undertaken by compliance officer with the resources, skills and experience to undertake these actions who also continuously monitors client activity

with a direct line reporting to senior management for any discrepancies in onboarding or monitoring of clients, we have 4 eye sign off for all high-risk clients which includes compliance officer and senior management agreement. JBR does not out source any KYC procedures nor receive any silver bearing material from intra company transfers.

How does the refiner classify identified risks in light of the standards of its due diligence system

JBR assess risks in light of the standards of their due diligence system.

We perform our supply chain due diligence in line with all measures required by the LBMA and UK money laundering regulations & other global standards where applicable, we check for PEPS, sanction lists local and global, we understand the structure and identify beneficial owners and check for CAHRA list prior to entering a business relationship with any supplier to include environmental social and governance risks. We monitor all transactions which take place through the course of the business relationship, and we conduct appropriate scrutiny and monitoring of our risk-based approach.

JBR did not supply, source or transit material to/from any high-risk area or conflict affected area as noted for the above criteria during this financial reporting year, though some actors are rated as high-risk within our supply chain due to collation methods of material supplied in rough cast bar form and one companies jurisdiction being within a low rated transparency international region.

JBR source of material did not relate to any suspected OECD annex II & CAHRA listed countries and to environmental and sustainability risks in our supply chain, we continually monitor these actors utilising our EDD procedures without any need for regulatory or communication with the LBMA at this time.

Has the refiner undertaken EDD measures for identified high-risk supply chains

JBR reports risk assessment to the designated manager-Managing Director.

JBR has undertaken on-site visits to higher risk suppliers ranging from Asia pacific, Europe and Americas, to eliminate and risk assess environmental, health and safety concerns, also including office site visits to understand due diligence procedures are being undertaken as stated by client, no high risks or red flags were identified during the visits undertaken, JBR did not utilise any 3rd party actors to undertake these visits and were all undertaken by senior members of JBR staff.

Visits are taken prior to or within 6 months of new relationship being started, due to the size and complexity of JBR these visits are sometimes delayed but undertaken at the earliest opportunity. We have undertaken 100% of high-risk visits all by JBR senior management, with no underlying issues led to theses visits, all undertaken to align with the responsible sourcing programme. Risks assessments are undertaken again on ad-hoc basis if required by highlighted increased risks.

The compliance officer verifies the potential risks in line with the internal codes of JBR as well as CAHRA, Dodd Frank listed countries, OECD 5 Step framework guidelines, FATF recommendations and UK money laundering & terrorist financing regulations. All new high-risk suppliers must be approved by senior management, whilst those existing high-risk clients are re-assessed annually.

Percentage of risk weighting for suppliers:

Low 87% /Medium 3% /High 10%,

Step 3: Risk assessment

Does the refiner design and implement a management strategy to respond to identified risks to the identified risks by either (i) mitigation of the risk while continuing to trade (ii) mitigation of the risk while suspending trade or (iii) disengagement from the risk?

Compliance Statement with Requirement:

JBR has fully complied with step 3: Design and implement systems to respond to identified risks.

JBR has adopted a screening process for all business partners to identify risks in the supply chain. The screening allows JBR to manage risk through a rigorous risk assessment of all business partners and transactions through a regular reassessment process. In addition, identified risks are brought up from compliance or business or any other stakeholder to senior management, which after careful analysis decide how to proceed and what kind of action-measures have to be taken.

The objective of this section is to evaluate and respond to identified risks in order to prevent or mitigate adverse impacts to the supply chain. Where appropriate, JBR will seek to enhance supplier engagement and our own systems of information collection and transparency. (Policy and procedure available www.jbr.co.uk)

Procedures are in place and applied accordingly. If a case of risk assessment identifies high risk or red flag criteria, we shall actively approach the supplier to receive further information. If it is deemed, we cannot mitigate the risk a decision to suspend/ close/ not begin the business relationship will be taken.

Process for design and implement systems to respond to identified risks.

1. Report Findings to Designated Senior Management Where appropriate, information gathered, and actual and potential risks identified in the supply chain risk assessment will be communicated to Senior Management.

2. Devise a Strategy for Risk Management of an Identified Risk by either (i) Mitigation of the Risk while Continuing Trade, (ii) Mitigation of the Risk while Suspending Trade or (iii) Disengagement from the Risk If the result of the silver supply chain due diligence concludes that there is money laundering, terrorist financing, serious human rights abuse, direct or indirect support to illegitimate non-state armed group, or fraudulent misrepresentation of the origin of minerals or if the possibility of the same is deemed too high, JBR will stop immediately to refine silver from this provenance/supplier and report it to the appropriate authorities if applicable. However, in case of indirect support to non-state armed group

carried out by extortion of good faith miners, refiners or other supply chain actors, JBR may continue to refine silver coming from this source provided that it adopts an improvement strategy.

If the result of the silver supply chain due diligence concludes that it is possible that there is money laundering, terrorist financing, serious human rights abuse, direct or indirect support to illegitimate non-state armed group or fraudulent misrepresentation of the origin of minerals, JBR should suspend refining silver from this provenance/supplier until it can obtain additional information/data confirming or refuting the preliminary assessment additionally all outstanding metal will be quarantined. Where the result of the due diligence is not fully satisfactory or when the result of the due diligence concludes that there is direct or indirect support to illegitimate public or private security forces, bribery, non- fraudulent misrepresentation of the origin of minerals or non-compliance of taxes fees and royalties due to government, but the assessed company in the supply chain is using reasonable and good faith effort, JBR may continue to refine silver coming from this source provided that it adopts an improvement strategy, devised with input and engagement from the supplier, which clearly defines performance objectives within a reasonable timeframe.

3. Where a management strategy of risk mitigation is undertaken, it will include measurable steps to be taken and achieved, monitoring of performance, periodic reassessment of risk and regular reporting to designated senior management. The principles of risk mitigation that underpin this section focus on good faith efforts to make meaningful improvements on the supply chain where JBR does not terminate their relationship with suppliers. The improvement strategy described in section 2 above shall state clear performance objectives, including qualitative and/or quantitative indicators in order to measure improvement. Significant and measurable improvement towards eliminating the risk within six months from the adoption of the risk management plan must be identified.

Additional measures will then be defined in a revised improvement strategy, based on the progress achieved within the first six months. If no such measurable improvement can be demonstrated within the six-month period, JBR shall suspend the relationship until the supplier has responded to the improvement plan. Risk mitigation plans and their effectiveness are subject to on-going monitoring with regular reports made to senior management.

JBR shall consider suspending or discontinuing engagement with a supplier after failed attempts at mitigation within six months from the adoption of the risk management plan. Where appropriate, JBR will consult and or monitor progress with stakeholders on the risk mitigation plan and make use of leverage over the actors across the supply chains who could contribute to risk mitigation.

Where appropriate JBR will cooperate and/or consult relevant stakeholders (such as local or central authorities, upstream companies, international or civil society organisations and affected third parties). JBR may also benefit from the creation or support of community-based monitoring networks to facilitate monitoring of risk mitigation measures. On the deadline, an assessment will be performed in order to determine if the measures have been properly undertaken. Senior Management shall be informed of the results and make a decision as to whether to continue dealing, disengage or suspend the supply chain in question. The decision-making process will be documented

The results of the risk management strategy adopted either of the following are undertaken (i) mitigation of the risk while continuing to trade (ii) mitigation of the risk while suspending trade or (iii) disengagement from the risk.

During this financial year JBR had no mitigation measures implemented, with onsite visitation to the counterparty undertaken to mitigate risks whilst continuing to trade. There have been zero disengagement or cases of cooperation with national or local government authorities.

Step 4: Independent Third-Party assurance

Compliance Statement with Requirement:

JBR have fully complied with step 4: Arrange for an independent third-party audit of our supply chain due diligence.

JBR have engaged the services of the assurance provider Mazars Switzerland as their independent limited assurance report can be viewed on www.jbr.co.uk, the audit was undertaken in May 2024 for reporting period April 2023- March 2024.

JBR shall rotate auditors every 10 years (or shorter) in line with the EU mandatory audit firm rotation requirements to enhance independence.

We were found to be in overall compliance with the LBMA responsible sourcing programme and audit found no medium or high-risk areas for immediate attention.

Step 5 Report on supply chain due diligence

JBR has published all relevant information regarding the audit on our website www.jbr.co.uk, to include but not limited to auditors details, audit activities and mythology, audit conclusion for each step of the LBMA responsible silver guidance (V2) additionally we have published the LBMA Summary report in accordance with the 3rd party audit guidance

Further information and specific details of how JBR systems, procedures, processes and controls have been implemented to align to the specific requirements in the LBMA Responsible Silver Guidance, have been set out in our responsible supply chain policy available on www.jbr.co.uk policies & procedures.

Management Conclusion

JBR is in compliance with the requirements of the LBMA Responsible Silver Guidance (V2) for the reporting period April 2023 -March 2024. JBR implemented effective management systems, procedures, processes and practices to conform to the requirements of the LBMA Responsible Silver Guidance (V2) as explained in the guidance, for the reporting year April 2022 -March 2023.

JBR are committed to continuous improvement for all aspects of its supply chain and any corrective actions identified will be monitored internally on a regular basis and action taken when and where appropriate.

We have published our public interest and sustainability reports to meet annual reporting expectations on our website www.jbr.co.uk responsible sourcing tab 2024.

Other report comments

If users of this report wish to provide any feedback to JBR Recovery Ltd with respect to this report, they can contact via email simon.meddings@jbr.co.uk or compliance@jbr.co.uk

Signed: *Simon Meddings*

Simon Meddings - Managing Director

Date April 2024



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