



Internal Management structure to support supply chain due diligence

JBR have adopted a strong policy regarding due diligence for supply chains.

We apply responsible supply chain policy based upon our company policy of compliance and ethics. The supply chain policy has been formulated during the last reporting year and is compliant with Annex II of the OECD due diligence for responsible minerals from conflict-affected and high-risk areas and LBMA responsible silver guidance.

This policy sets out our full commitment to:

Fight human rights abuses associated with extraction, transportation and trade of precious metals;

To mitigate the risk of money laundering and responsibility to conduct systematic risk-based due diligence over our supply chains upstream and downstream;

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.

The following documents make up JBR's supply chain and anti-money laundering policies and procedures, which are signed off by senior management on an annual basis, to include sign off on update to these procedures on an ad-hoc basis to assist the mitigation of risks when they arise:

Compliance Manual;

Compliance and Ethics policy;

Responsible supply chain policy;

Anti -corruption and bribery policy;

Human rights policy;

Modern anti-slavery and human trafficking statement;

Financial crime and customer KYC procedures;

New customer due diligence form-including recycled metal supply chain questionnaire;

Due diligence assessment matrix;

Process for accepting silver bearing materials;
Live scrap silver supply due diligence policy;
Transportation risk assessment policy;
Supplier risk matrix;
Confidentiality and data protection agreement;
Recycled metal visitation report;
Mined metal site visitation report;
Mined metal due diligence questionnaire;
LBMA supply chain assessment form;
Enhanced due diligence checklist;
LBMA Global precious metals code of conduct statement;
Annual business level risk assessment;

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Date: 19/05/20

Signature: *Simon Meddings*