



## JBR Recovery Ltd

### Environmental, Social and Governance policy

#### 1. Environmental, social and governance policy (ESG)

##### 1.1 Introductory Scope

This Policy provides framework for support of worldwide efforts & active cooperation with suppliers & stakeholders to ensure that precious metals are sourced ethically through our responsible sourcing policy which is also aligned with JBR's environmental, social and governance policy.

Our supply chain due diligence & congruent commitment, policies & practices, are consistent with the 5-step framework of OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict- Affected and High-Risk Areas and the 3-step framework ESG requirements of the LBMA Responsible sourcing performance programme. (as follows)

Step 1: JBR's responsible supply chain due diligence includes a policy that extends to ESG requirements. Under this step JBR strengthen ESG engagement with silver suppliers and where possible, assist silver supply counterparties build due diligence capacities, to include but not limited to use of mercury in Artisanal and small-scale mining (ASM), with the expectation that JBR assist in establishing processes to eliminate its use.

Step 2: JBR assesses the risk in the supply chain, this includes assessing the environmental policies and practices of the suppliers both in relation to ASM and large-scale mining (LSM).

Step 3: Once JBR have assessed the risks, JBR shall implement its management strategy to respond to identified ESG risks and shall provide evidence of the sustainability policy and its affect on any associated initiatives thought the supply chain.

#### 2. Environment and social standards

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

JBR sets out the responsibilities for assessing, managing and monitoring environmental & social risks and impacts associated with each stage of supply, in order to achieve

environmental and social outcomes consistent with its Environmental and Social Standards (ESSs).  
(JBR Environmental, social and governance policy)

## **2.2 Labour and Working Conditions**

JBR recognises the importance of employment creation and income generation in the pursuit of poverty reduction and inclusive economic growth. Suppliers can promote sound worker-management relationships and enhance the development benefits of a project by treating workers in the project fairly and providing safe and healthy working conditions.  
(JBR Human rights policy)

## **2.3 Resource Efficiency and Pollution Prevention and Management**

JBR recognises that economic activity and urbanisation often generate pollution to air, water, and land, and consume finite resources that may threaten people, ecosystem services and the environment at the local, regional, and global levels. This ESS sets out the requirements to address resource efficiency and pollution prevention and management throughout the project life-cycle, through request of environmental policies and/or environmental certification from suppliers within its supply chain.  
(JBR Environmental certification)

## **2.4 Community Health and Safety**

JBR addresses the health, safety, and security risks and impacts on project-affected communities and the corresponding responsibility of suppliers to avoid or minimise such risks and impacts, with particular attention to people who, because of their particular circumstances, may be vulnerable.  
(JBR Modern anti-slavery and human trafficking statement)

## **2.5 Land Acquisition, Restrictions on Land Use and Involuntary Resettlement**

Involuntary resettlement should be avoided. Where involuntary resettlement is unavoidable, it will be minimised and appropriate measures to mitigate adverse impacts on displaced persons (and on host communities receiving displaced persons) will be carefully planned and implemented.  
(JBR compliance and ethics policy)

## **2.6 Biodiversity Conservation and Sustainable Management of Living Natural Resources**

JBR recognises that protecting and conserving biodiversity and sustainably managing living natural resources are fundamental to sustainable development and it recognises the importance of maintaining core ecological functions of habitats, including forests, and the biodiversity they support. ESS also addresses sustainable management of primary production and harvesting of living natural resources, and recognises the need to consider the livelihood of project-affected parties, including Indigenous Peoples, whose access to, or use of, biodiversity or living natural resources may be affected by a project.  
(JBR Responsible supply chain policy)

## **2.7 Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities**

JBR ensures that the development process fosters full respect for the human rights, dignity, aspirations, identity, culture, and natural resource-based livelihoods of Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities. ESS is also meant to avoid adverse impacts of projects on Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities, or when avoidance is not possible, to minimise, mitigate and/or compensate for such impacts.  
(JBR human rights policy & anti-corruption and bribery policy)

## **2.8 Cultural Heritage**

JBR recognises that cultural heritage provides continuity in tangible and intangible forms between the past, present and future. ESS sets out measures designed to protect cultural heritage throughout the project life-cycle.  
(JBR Human rights policy)

## **2.9 Financial Intermediaries (FIs)**

JBR recognises that strong domestic capital and financial markets and access to finance are important for economic development, growth and poverty reduction. FIs are required to monitor and manage the environmental and social risks and impacts of their portfolio and FI subprojects, and monitor portfolio risk, as appropriate to the nature of intermediated financing. The way in which the FI will manage its portfolio will take various forms, depending on a number of considerations, including the capacity of the FI and the nature and scope of the funding to be provided by the FI.  
(JBR supply chain policy - subsection 2: Our commitments)

## **2.10 Stakeholder Engagement and Information Disclosure**

JBR recognises the importance of open and transparent engagement between the supplier and stakeholders as an essential element of good international practice. Effective stakeholder engagement can improve the environmental and social sustainability of projects, enhance project acceptance, and make a significant contribution to successful project design and implementation.  
(JBR responsible supply chain policy subsection 3: JBR whistleblowing policy)



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