

StoneX[®]

STONEX METALS LTD

Human Rights Policy

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1 Introductory Scope

1.1 Respect for human rights is one of the fundamental values of the corporate strategy behind StoneX Metals Ltd (“SML”) which dedicates particular attention to compliance with, and implementation of, principles & obligations enshrined in binding voluntary national and international laws governing this subject matter. SML guarantees respect for universally recognised human rights and commits that all its commercial partners comply with, observe and adopt the values shared by SML

2 Human rights in the supply chain

2.1 SML undertakes stringent policies and procedures to ensure that the precious metals in the supply chain originate from legal and ethical sources, not associated with crimes, armed conflicts or human rights abuses, and that precious metals will not be exploited for money laundering, financing terrorism and / or tax evasion / fraud and / or any other crimes

2.1.1 Prohibition of Child Labour

Nobody may be hired if they are below the minimum age permitted by law in their respective jurisdiction.

The minimum age of completion is deemed to be the age of compulsory schooling, which is 15, as set out in ILO Convention No. 138, or not less than 14 in those countries in which this is permitted under local law.

https://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:12100:0::NO::P12100_ILO_CODE:C138

2.1.2 Hazardous Work

SML does not tolerate the employment of minors for hazardous work which, due to its nature or circumstance, could endanger the health, safety, customs or lifestyle of minors below the age of 18. In those cases contemplated under local laws, where a minimum age of 16 is permitted, SML will tolerate the employment of minors only if the health and safety, customs and lifestyles of the minors involved are protected in every respect, and that the minors have received appropriately specific instructions or professional training in the corresponding field of activity.

2.1.3 Worst forms of Child Labour

SML does not tolerate the worst forms of child labour as described by ILO Convention No. 182 on the worst forms of child labour.

https://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:12100:0::NO::P12100_ILO_CODE:C182

2.1.4 Prohibition of Forced Labour

SML does not tolerate & condemns any form of Forced Labour as defined in ILO Convention No. 29, including slave labour, labour exacted under threat of penalty or involuntary labour.

https://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:12100:0::NO::P12100_ILO_CODE:C029

2.1.5 Non-discrimination

Every individual must be treated with respect and dignity.

SML does not tolerate and condemns any form of discrimination and any form of harassment or prejudice on grounds of race, ethnic origin, gender, religion, handicap, age or sexual identity and any illegal form of threat or intimidation.

SML does not tolerate any form of discrimination in the workplace in relation to hiring, remuneration, overtime, and access to training, promotion, the end of the employment relationship or retirement. Similarly, political or religious activities in the workplace are not tolerated, neither by employees of SML nor third parties.

All employees shall enjoy equal opportunities without any discrimination based on factors unrelated to their capacity to carry out their work

2.1.6 Freedom of association and collective bargaining

Within the limits permitted under any mandatory legislation, all employees shall be free to decide on whether to set up or join trade unions or equivalent representative organisations, and to exercise their rights to collective bargaining.

2.1.7 Workplace safety

For SML workplace safety is of fundamental importance.

All collaborators, in particular managers, must comply with the mandatory rules and regulations on safety in the workplace and in employment so as to ensure overall safety in the workplace.

3 Human Rights Due Diligence

3.1 Human rights Due Diligence at SML is an integral part of the general Due Diligence process and its objective is:

- to identify and assess the risk of violation of human rights;
- to prevent and mitigate the negative impact of the risks detected, if they are linked to the activities of SML either directly or indirectly; and
- to manage the negative impact if this impact derives from the direct or indirect activities of SML.

Human rights Due Diligence must take place before initiating the business relationship. The corresponding checks must be repeated during the business relationship whenever this is deemed necessary or if changes regarding the risk of the violation of human rights become known.

4 Monitoring the Observance of Human Rights

4.1 In order to check whether human rights are being respected by its contractual partners, the relevant Due Diligence process at SML contemplates a series of measures which include the following:

- Information and sharing of its policies in relation to human rights;
- Document analysis in order to check and confirm whether the counterparts are complying with the local laws governing this subject matter;
- Site visits, including if possible, the opportunity of guided interviews with workers to assess the situation and the workplace conditions;
- Special clarifications in the case of doubts and / or suspicions regarding the violation of human rights;
- Refusal to initiate or termination of the business relationship in the event that unacceptable violations are detected which are impossible to manage and which run contrary to the principles shared by SML.

5 Definitions

5.1 Human Rights are rights universally recognised to which all human beings are entitled to, regardless of race, sex, nationality, ethnicity, language, religion, or any other status. All human rights are universal, inalienable, indivisible and interdependent

6 References

- Universal declaration of human rights;
- International Labour Organisation (ILO) Declaration on Fundamental Principles & Rights at Work & the main corresponding Conventions;
- OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected & High-Risk Areas & the Supplement on Gold, 2013;
- LBMA Responsible Gold Guidance;
- LBMA Responsible Silver Guidance.
- The World Gold Council Conflict Free Gold Standard, 2012;
- UN Guiding Principles on Business & Human Rights, 2011;
- The Conflict-Free Sourcing Initiative: Five Practical Steps to Support SEC Conflict Minerals Disclosure, 2015;
- FATF Recommendations;
- The Extractive Industry Transparency Initiative (EiTi)