



Hindustan Platinum

**LBMA and LPPM
Responsible Sourcing
Introduction**



INTRODUCTION



Hindustan Platinum Private Limited (HPPL – "the Company") is committed to upholding the utmost levels of business conduct and ethical practices in accordance with commercial standards, applicable laws, rules, and regulations. Furthermore, the Company strives to establish a monitoring mechanism to ensure the implementation of supply chain policy, while also adhering to the applicable OECD, LBMA and LPPM guidelines.

HPPL, being a London Good Delivery refiner for Platinum, Palladium and Silver and Sponge accreditation Refiner for Platinum, Palladium and Rhodium upholds the highest standards of ethical, moral, and social responsibility in its business operations in consideration of the ESG factors. We maintain a strict requirement for all our employees to uphold integrity and honesty. Additionally, we diligently monitor our entire business cycle, from sourcing to the delivery of finished products, to identify and mitigate any associated risks.

HPPL strives to lead by example in the precious metals industry by integrating robust Environmental, Social, and Governance (ESG) principles into every aspect of its sourcing and operational strategy. We aim to minimize adverse environmental impacts, uphold human rights, and contribute positively to society through our value chain.

INTRODUCTION



This Supply Chain policy reflects HPPL's proactive stance in shaping and adhering to responsible sourcing standards and serves as a guiding framework for our partners and stakeholders across the supply chain. We believe that by working collaboratively with suppliers, customers, and industry peers, we can foster a more just, equitable, and sustainable global supply network

- **Applicability and Scope:**

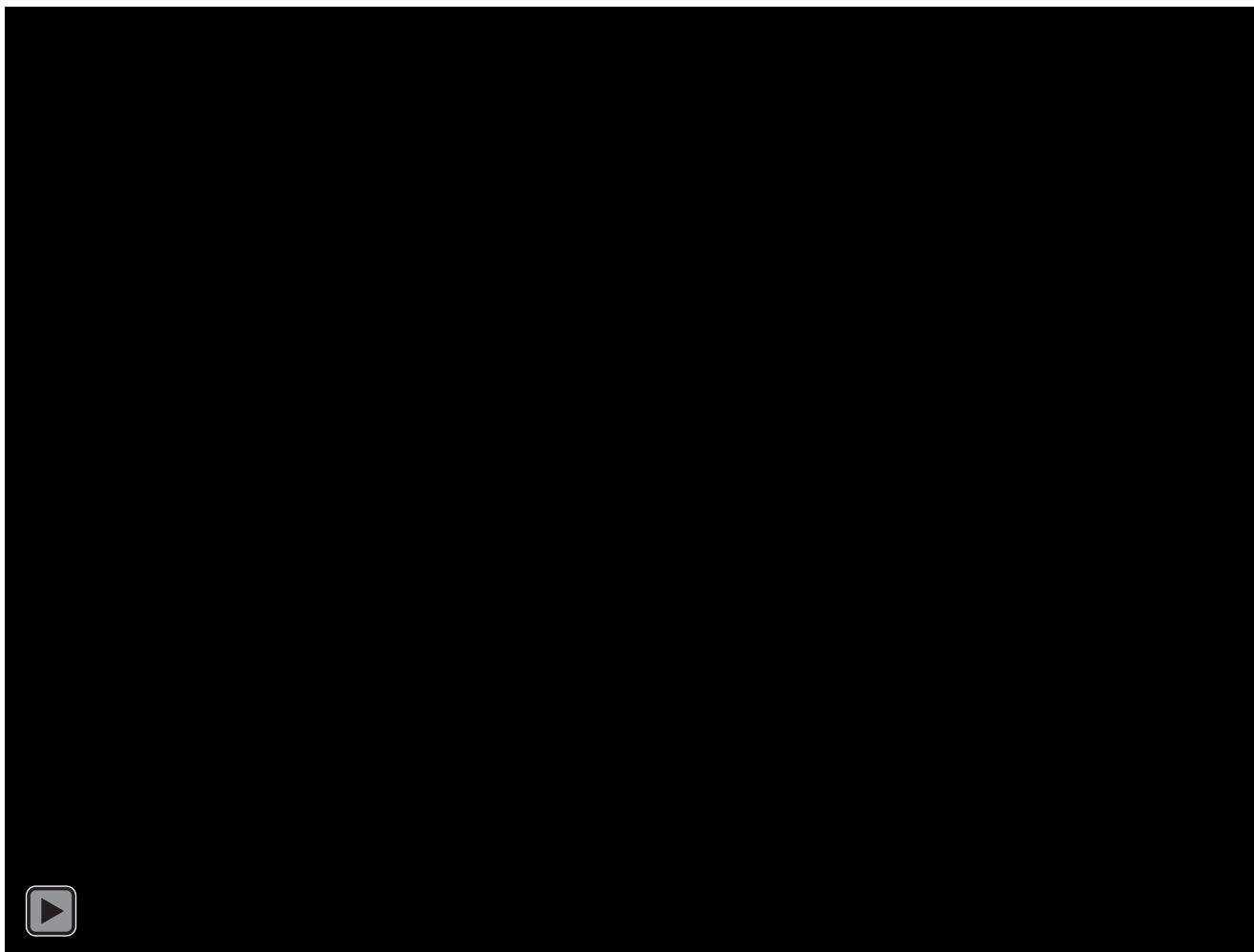
The policy is applicable to the refining of Silver, Platinum, Palladium, Gold, Rhodium and Ruthenium. This policy extends to all employees, suppliers, and customers of the company.

Any modifications or revisions to the policy require approval from the Board of Directors before becoming effective. Furthermore, the policy applies to all subsidiaries and group entities of HPPL

INTRODUCTION TO RESPONSIBLE SOURCING



Introductory Video



RESPONSIBLE SOURCING – PURPOSE



The policy implemented by HPPL encompasses the following key parameters as per OECD guidelines.

- Establishing robust company management systems.
 - Identifying and assessing risks within the supply chain.
 - Developing and implementing a management strategy to address identified risks.
 - Monitoring all transactions to ensure compliance with the policy and maintaining accurate records to demonstrate compliance.
 - Strictly adhere to local and applicable international sanctions including but not limited to UN, EU, UK and US.
 - Not tolerate sourcing from illegal mining operations or from an area designated as a World Heritage Site
 - Reporting on the outcomes of supply chain due diligence efforts.
 - Conducting independent third-party audits of the supply chain due diligence, as mandated by LBMA/LPPM.
 - Ascertain that our suppliers of precious metals are committed to this Responsible Precious Metals
 - Policy or to their own precious metals supply chain policy consistent with the OECD Annex II.
-

RESPONSIBLE SOURCING - OBJECTIVE



To ensure HPPL to respect human rights and avoid contributing to conflict through their mineral sourcing practices.

Intended to cultivate transparent material supply chains and sustainable corporate engagement in the view to enabling countries to benefit from their mineral resources and preventing the extraction and trade of material from becoming a source of conflict, human rights abuses, and insecurity.

Sets out the steps companies should take to identify and address actual or potential risks to prevent or mitigate adverse impacts associated with their activities or relationships, while recognizing that flexibility is needed in its application depending on individual circumstances and factors such as the size of the enterprise, the location of the activities, the situation in a particular country, the sector and nature of the products or services involved.

To establish and maintain a system that ensures that HPPL achieves conformity with its:

- I. Compliance and Supply Chain Policy.
 - II. All relevant Indian rules and regulations (such as but not limited "On Anti-Money Laundering And Combating The Financing Of Terrorism And Financing Of Illegal Organizations").
 - III. As well as selected responsible material guidance such as the ones published by the OECD, LBMA, LPPM.
-

RESPONSIBLE SOURCING – WHY ?



In conflict-affected and high-risk areas, companies involved in mining and trade in material have the potential to generate income, growth and prosperity, sustain livelihoods and foster local development. In such situations, companies may also be at risk of contributing to or being associated with significant adverse impacts, including serious human rights abuses and conflict.

The purpose of this Guidance is to help companies respect human rights and avoid contributing to conflict through their sourcing decisions, including the choice of their suppliers. By doing so, this Guidance will help companies contribute to sustainable development and source responsibly from conflict-affected and high-risk areas, while creating the enabling conditions for constructive engagement with suppliers.

This Guidance is intended to serve as a common reference for all suppliers and other stakeholders in the mineral supply chain and any industry-driven schemes which may be developed, in order to clarify expectations concerning the nature of responsible supply chain management of material from conflict-affected and high-risk areas.

CONFLICT-AFFECTED AND HIGH-RISK AREAS



Conflict-affected and high-risk areas are identified by the presence of armed conflict, widespread violence or other risks of harm to people.

Armed conflict may take a variety of forms, such as a conflict of international or non-international character, which may involve two or more states, or may consist of wars of liberation, or insurgencies, civil wars, etc. High-risk areas may include areas of political instability or repression, institutional weakness, insecurity, collapse of civil infrastructure and widespread violence.

Such areas are often characterized by widespread human rights abuses and violations of national or international law



LBMA/LPPM/OECD: BACKGROUND



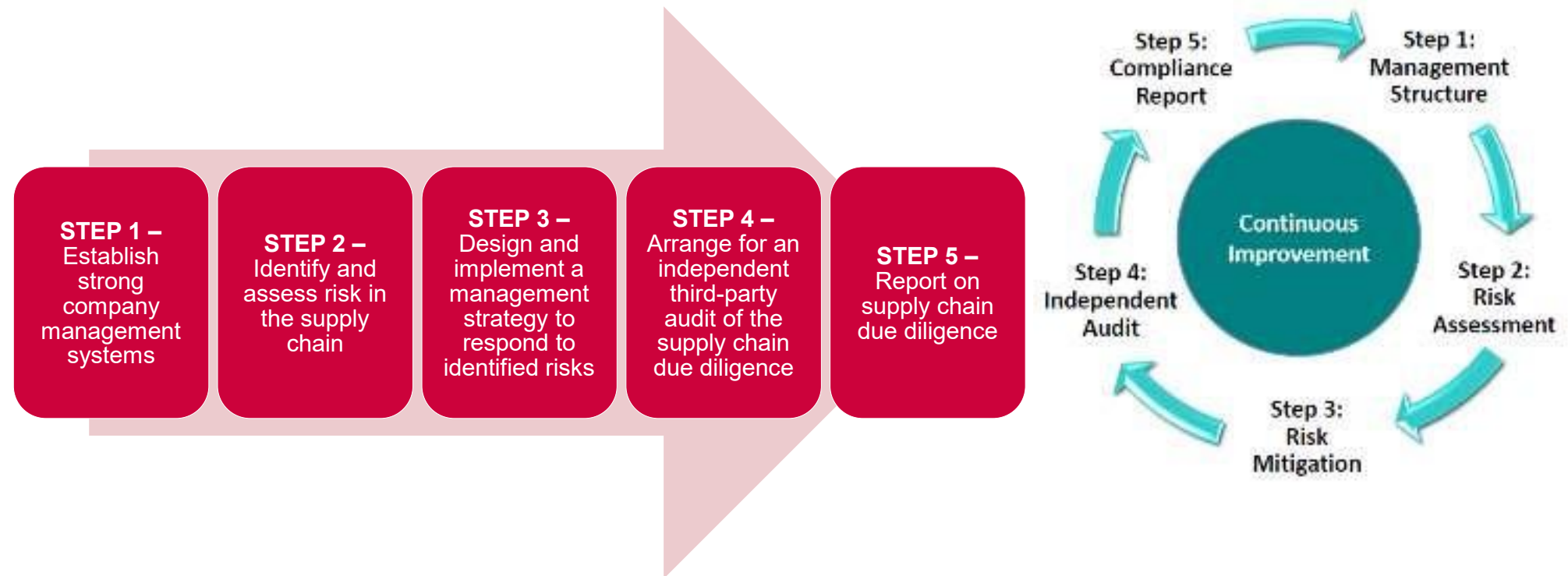
The **London Bullion Market Association** (“LBMA”) and **London Platinum and Palladium Market** (“LPPM”) requires all Refiners producing Good Delivery material and Sponge accreditation (“Refiners”) to comply with the LBMA/LPPM Responsible Sourcing Guidance.

The **Responsible Sourcing Guidance** aims at combating systematic or widespread abuses of human rights, avoiding contribution to conflict and expects Refiners to comply with high standards of anti-money laundering and combating terrorist financing activities.

The Guidance follows the **five steps framework for risk-based due diligence** of the OECD Due Diligence Guidance for Responsible Supply Chains of material from Conflict-Affected and High-Risk Areas and follows the requirements detailed in the OECD Supplement.

- **Scope:** All Refiners producing LBMA/LPPM Good Delivery material and Sponge accreditation (“Refiners”) must comply with LBMA/LPPM Responsible sourcing Guidance to remain on the LBMA/LPPM Good Delivery and Sponge accreditation List.

FIVE STEP FRAMEWORK FOR RISK-BASED DUE DILIGENCE



STEP 1 -ESTABLISH STRONG COMPANY MANAGEMENT SYSTEMS



STEP 1



STEP 2 - IDENTIFY AND ASSESS RISK IN THE SUPPLY CHAIN



Upstream

Source



A high-risk area



An area with limited known reserves



Materials from high-risk areas are known to transit

Supplier



Has stake in company that operates in high-risk area



Has sourced materials from high risk area in past year

Circumstances



Raising suspicion of links to abuses or conflict

OECD: Red Flags

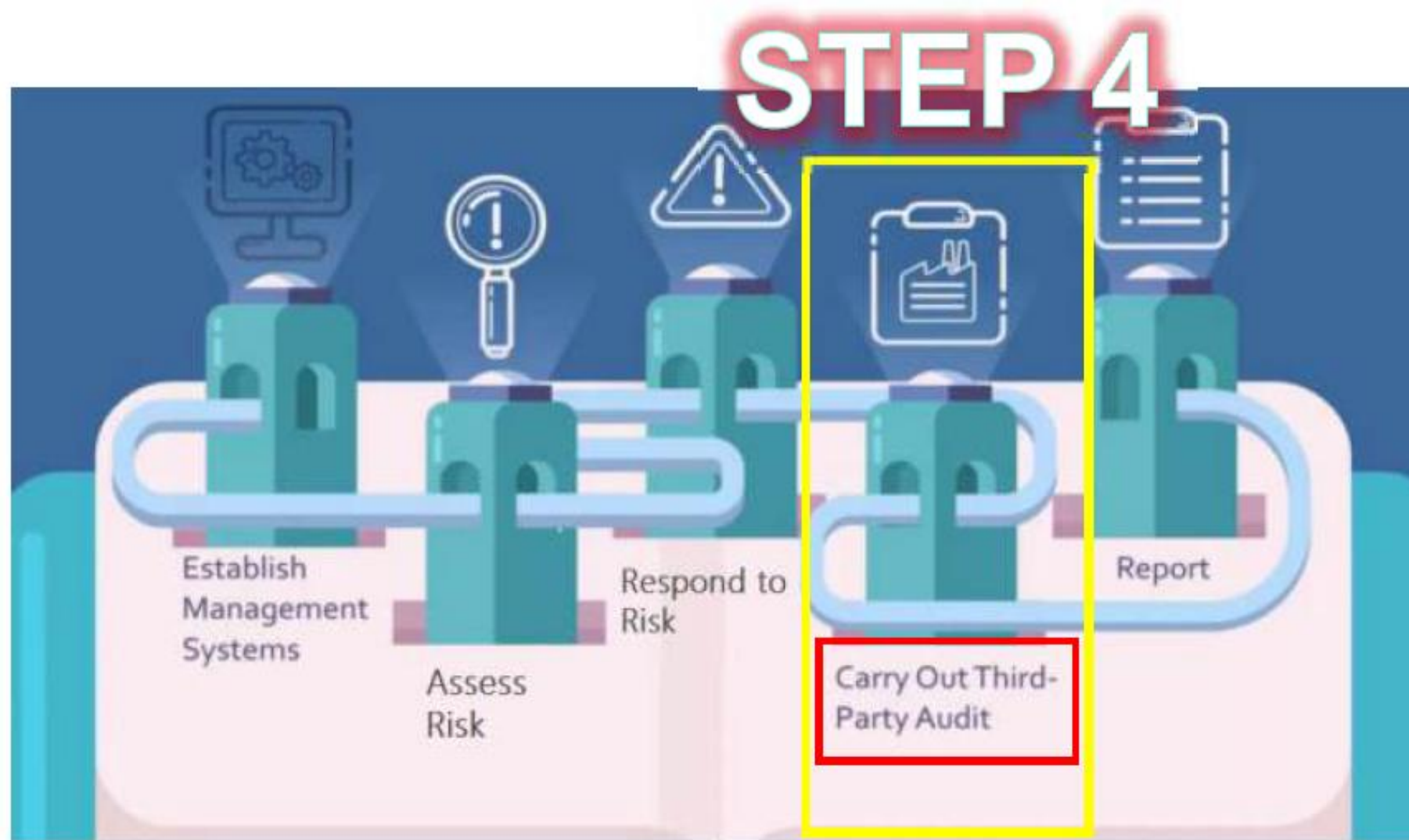
STEP 3 - DESIGN AND IMPLEMENT A MANAGEMENT STRATEGY TO RESPOND TO IDENTIFIED RISKS



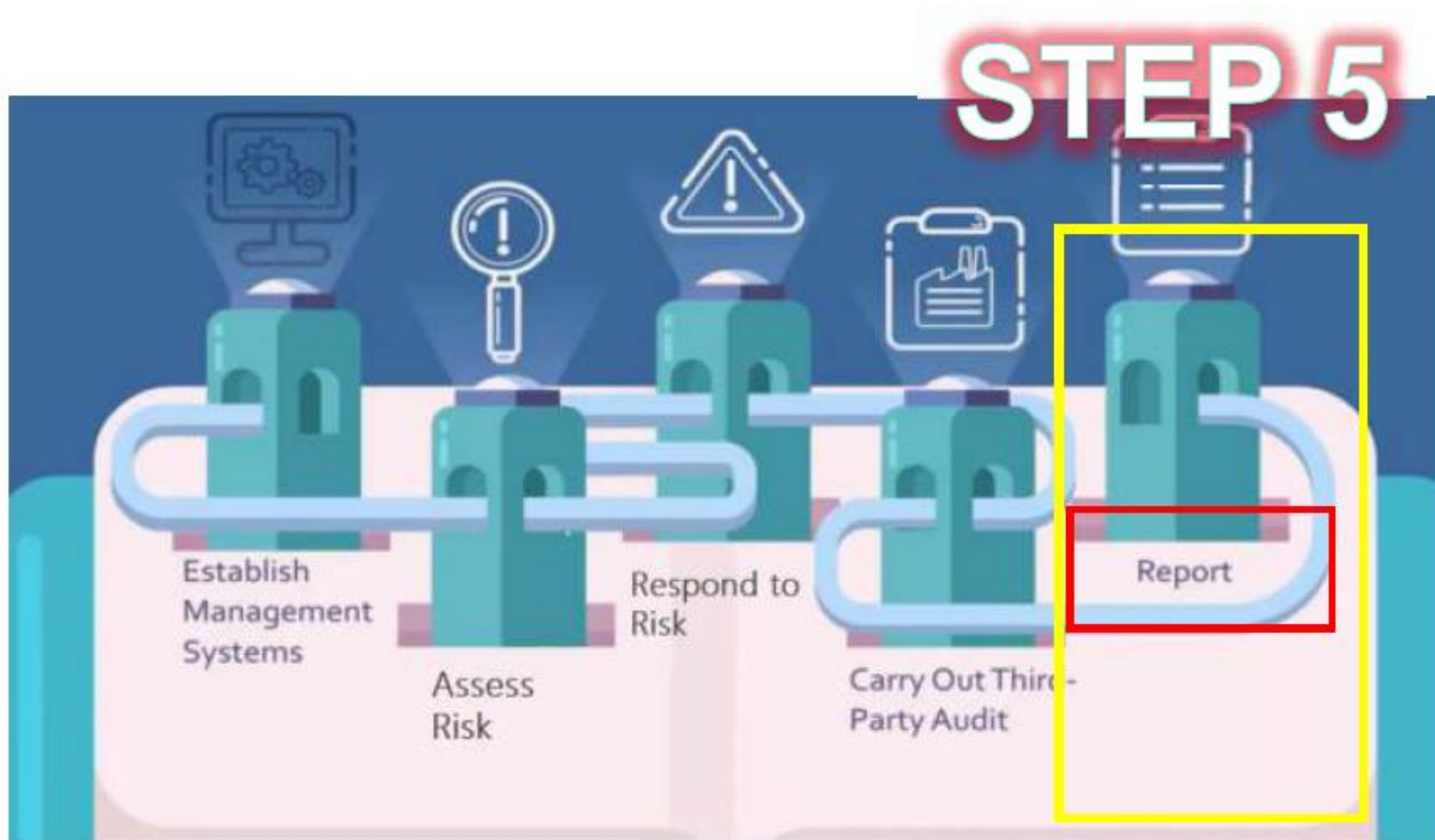
STEP 3



STEP 4 - ARRANGE FOR AN INDEPENDENT THIRD-PARTY AUDIT OF THE SUPPLY CHAIN DUE DILIGENCE



STEP 5 - REPORT ON SUPPLY CHAIN DUE DILIGENCE



Responsible Sourcing Certificates – FY 24-25



Thank you