

Responsible Sourcing of Precious Metals Declaration



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ICBC Standard Bank Plc. (the “Bank”) recognises as best practice the World Gold Council’s Conflict Free Gold Standard, the Organisation for Economic Cooperation and Development’s (OECD) Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (and associated Gold Supplement) (OECD Guidance) and London Bullion Market Association’s (LBMA) Responsible Gold and Silver Guidance and the London Platinum and Palladium Market’s (LPPM) Responsible Platinum and Palladium Guidance. The Bank also recognises as best practice the principles set out in the Dodd-Frank Wall Street Reform and Consumer Protection Act Section 1502 in respect of specified Conflict Affected Countries.

In line with the OECD Guidance, the Bank publishes this annual report detailing the following action it has taken:

Step 1. Company Management Systems

The Bank has developed and operates a responsible sourcing framework for precious metals and a detailed due diligence and risk assessment procedure in relation to the trading of physical precious metals. This procedure promotes responsible practices in the sourcing of precious metals, and seeks to ensure that the Bank sources precious metals in the course of its business from legitimate and ethical sources, and deals only with bona fide counterparties and clients who take an ethical approach to the responsible sourcing of precious metals.

Furthermore, the Bank has implemented a Responsible Sourcing of Precious Metals Policy. Under this Policy the Bank commits not to tolerate, contribute to, assist or facilitate:

- a) War crimes and other armed conflict, including contributing to such conflict or direct or indirect support of armed militias;
- b) Terrorism and terrorist financing;
- c) Human rights abuses, including child labour;
- d) Money laundering;
- e) Corruption, bribery and fraud;
- f) Sanctions transgressions;
- g) The facilitation of tax evasion; or
- h) Mining operations in violation of environmental regulations.

Step 2. Risk Identification and Assessment

The responsible precious metals sourcing framework has been designed to identify and assess risk on the circumstances of extraction, consolidation, trading, and export of precious metals from conflict-affected and high-risk areas.

Step 3. Risk Mitigation

Risks of upstream supply chain parties identified through the responsible precious metals sourcing framework have been evaluated by the Bank in accordance with internal policies and procedures, and steps have been taken to ensure the relevant parties are conflict-free and are sourcing responsibly.

ICBC  **Standard Bank**

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