

Abington Reldan Metals LLC, DBA Sibanye Stillwater Reldan Public Due Diligence Report 2025

Abington Reldan Metals, LLC (DBA Sibanye-Stillwater Reldan) is a global leader in precious metals recycling and refining, advancing circular economy outcomes through clean technologies and high recovery rates. Our mission is to maximize metal recovery while supporting decarbonization across global supply chains.

Based in Pennsylvania (CID002708 – Conformant to Responsible Minerals Assurance Process (RMAP) Gold Standard), our Falls Township facility processes industrial and electronic waste streams, delivering sustainable outputs through integrated services including collection, dismantling, shredding, processing, and logistics.

We support global OEMs by transforming complex end-of-life material management into compliant, transparent, and value-generating solutions aligned with net-zero goals. Our systems provide end-to-end visibility, enabling scalable, risk-mitigated recovery.

This report covers due diligence activities from January 1, 2025 to December 31, 2025, in alignment with OECD Guidance for Responsible Mineral Supply Chains (CAHRAs). During 2025, integration under Sibanye-Stillwater strengthened governance and alignment with international responsible sourcing standards, with key enhancements in:

- Governance and oversight
- Risk and compliance systems
- Internal controls and accountability
- Transparency across sourcing and reporting
- Program effectiveness and maturity
- Audit outcomes
- Identified risks and mitigation actions
- Continuous improvement initiatives
- Commitment to responsible sourcing, transparency, and sustainable supply chain management.

1. Establish Strong Company Management Systems

Due Diligence Framework

Reldan maintains a due diligence system aligned with OECD and RMAP requirements. This system is implemented via the Scrap Supplier Validation KYC process that includes:

- Monitoring High-risk countries
- Responsible Sourcing Policy
- Conducting Supplier onboarding and screening
- Responsible Sourcing Committee oversight
- CAPA system and Grievance mechanisms

Internal Controls and Systems

In 2025, enhancements focused on strengthening compliance and environmental stewardship:

- Alignment of operational practices with regulatory and certification requirements
- Improved environmental, health, and safety monitoring with escalation protocols
- Enhanced document control aligned with local and global data protection and environmental standards
- Strengthened KYC and due diligence controls

2025 Program Enhancements

- Improved CAPA effectiveness through standardized root cause analysis
- Strengthened environmental compliance
- Enhanced safety programs
- Implementing RMAP Recycler Enhanced Due Diligence Assessments for all high high risk countries
- Implmeneted RMI Individual Due Dilligence Risk Assessment Reports

2. Identify and Assess Risks in the Supply Chain

Sibanye Stillwater Reldan is committed to strong, long-term, ethical, and responsible sourcing and compliance with OECD Annex II, UN resolutions, and applicable regulations.

Risk Assessment Approach

- Supplier onboarding questionnaires and risk classification through the KYC process
- Global environmental, social and governance, risk classification and mitigation

- Ongoing assessment of CAHRA Map and open sources to determine risks
- Enhanced Due Diligence (EDD) for extreme-high-risk suppliers
- Compliance with anti-money laundering (AML) standards
- Compliance with standards on combatting the financing of terrorism (CFT);
- Robust global sanctions and watchlist screening (e.g., Bridger Insight)
- Ongoing monitoring and periodic reassessment

We actively prevent:

- Human rights abuses associated with and across activities, including the extraction, transportation, or commercialization of minerals
- Conflict financing and any support to armed groups and/or illegally acting public or private security forces;
- AML/CFT violations
- Bribery and misrepresentation
- Non-payment of government dues

Risk Identification (2025)

- Material traceability and inventory accuracy
- Environmental Compliance controls compliance
- Safety controls and hazard identification
- Data security and sanitization scope

All risks are addressed within the due diligence framework. The Policy is publicly available on the RMI Homepage under our CID number in the conformant Gold smelters list and the Reldan company website.

3. Design and Implement a Strategy to Respond to Identified Risks

Sibanye-Stillwater Reldan adheres to its Supply Chain Policy by implementing robust internal procedures designed to ensure compliance with responsible sourcing standards and due diligence requirements. These procedures encompass the following key elements:

Management Structure

- Oversight by SVP and Chief Compliance Officer
- Responsible Sourcing Committee governance
- Dedicated due diligence team and cross-functional coordination
- Annual AML/CFT and Due Diligence Training

Risk Mitigation Framework

Enhanced in 2025 to ensure consistent, measurable outcomes:

- Monthly CAHRA Map and open source reviews
- Integration with RMAP and Customs-Trade Partnership Against Terrorism (CTPAT) programs to address the global supply chain in real time
- Immediate corrective actions
- Root cause analysis and CAPA implementation
- Defined ownership, timelines, and verification
- Effectiveness validation

Outcomes

All identified risks were mitigated through:

- Process and control improvements
- Updated procedures
- Targeted training and awareness programs
- Increased monitoring, evidence collection, and verification

Internal Systems of Control

- Robust KYC procedures for supplier validation
- Risk-based supplier onboarding and periodic review (24–36 months)
- CAPA-driven grievance tracking (no grievances reported in 2025)
- Confidential reporting channels for ethical concerns

Recordkeeping

- ERP-based transaction tracking
- Third-party audited inventory reconciliation
- Minimum five-year record retention

As part of our continued efforts to promote transparency and stakeholder engagement, any party wishing to raise concerns regarding the circumstances of mineral extraction, trade, handling, or export may report them directly to compliance@reldan.com or through the Sibanye Stillwater Tips Hotline at 1-800-317-0287 (U.S. operations) without fear of retaliation and enabling anonymous reporting of unethical conduct,

including fraud, corruption, illegal mining, product theft, misappropriation of company property, timekeeping fraud, copper theft, and theft of explosives.

4. Carry Out Independent Third-Party Audit (RMAP)

Sibanye Stillwater Reldan maintained its RMAP Conformant status. The report is publicly available [Conformant and Cross-Recognized Gold Refiners \(responsiblemineralsinitiative.org\)](https://responsiblemineralsinitiative.org). Surveillance activities and internal compliance reviews were conducted during the reporting period to ensure continued adherence to RMAP requirements.

Audit and Surveillance

- Internal audits and system reviews
- Continuous compliance monitoring
- Ongoing readiness for external audits

Risk Management and Engagement

Procedures aligned with RMAP and OECD Annex II ensure:

- Risk identification and escalation to Responsible Sourcing Committee and Chief Compliance Officer
- Stakeholder engagement and mitigation planning
- Measurable corrective actions
- Supplier engagement or disengagement where necessary

Sibanye Stillwater Reldan will remain engaged with a supplier to minimize risks when deemed to have a positive social impact on stakeholders in the supply chain. When all efforts to mitigate risks are exhausted or cannot adequately engage stakeholders to participate in risk mitigation, Reldan will disengage from a supplier. The CAHRA identification procedure was updated in 2025 to reflect current risk mapping and open-source evaluations.

5. Annual Reporting

1. How Red Flag information strengthened Reldan's Due Diligence.

During the reporting period, Reldan collected information through the KYC process, site visits, supplier risk assessments, watchlist screening, and the RMI Supply Chain Mapping Tool. This information directly strengthened Reldan's due diligence efforts by:

- Identifying high-risk suppliers earlier in the onboarding process
- Prevented business relationships with high-risk counterparties

2. Summary of Red Flag Review Methodology and Results Methodology:

Reldan applied the OECD Step 2 red flag identification process, which includes:

- Supplier KYC information review
- Beneficial ownership verification
- Geographical risk assessment using RMI and OECD CAHRA indicators
- Site visit findings for high-risk suppliers

Sites were selected based on CAHRA and/or origin of material. No OECD Annex II risks identified during on-site assessments. All identified red flags were reviewed and assigned corrective actions where applicable.

In summary:

- ~3,258 transactions reviewed with no Annex II risks identified
- 189 Know your Counterparty (KYC) reviews completed. 134 KYC were for suppliers onboarded and 55 KYC were for existing customers cycle review
- 3 suppliers KYCs were rejected due to non-compliance
- 20 enhanced due diligence assessments conducted
 - From these assessments, 15 on site assessments were conducted with trained on site assessment staff using form ARM-100-FOR-045.

Conclusion

Reldan remains fully committed to responsible and ethical business practices across all aspects of our operations.