Transparency, Data Privacy Procedures and Controls

“Transparency, procedures and controls hold us accountable to our key stakeholders.” – Zack Buekman
(Group Legal and Director)

Anti-Money Laundering & Anti-Terrorist Financing

Our Commitment
Cometa’s anti-money laundering policy ensures that we comply with international and domestic laws and regulations which prevent, identify and appropriately manage money-laundering and terrorist financing risk.

Money laundering is the process of concealing the criminal origin of money or other assets (such as raw materials), so they appear to come from a legitimate source.

This policy applies to all employees, directors and officers, as well as contractors under Cometa’s direct supervision, working for a Cometa office or industrial asset directly or indirectly controlled in the group.

OECD Guidelines, FATF Recommendations, EU Directives, KYC Practice

Procedures and Controls
To manage our money laundering risk exposure and ensure compliance, we implement several controls and processes.

These include:
• conducting know your counterparty and due diligence procedures to determine the background and identity of our counterparties; and
• implementing controls in respect of payments we make and receive using a risk-based approach to ensure that they are consistent with the requirements of this policy. For example, as a general rule, we make all payments under our contracts to, and receive payments from, our contractual counterparties to avoid the risk of facilitating money laundering or tax evasion.

Anti-Bribery and Anti-Corruption

Our Commitment
Recognizing the potential for risk and exposure in the South African mining industry, Cometa commits to a zero-tolerance stance on corruption and bribery, we therefore employ the following measures,

• We do not engage or promote bribery of any kind or form (whether monetary or in

Procedures and Controls
Public officials: Are recognised as high-risk. No exchanging of gifts or entertainment with public officials or providing assistance to public officials, shall be tolerated, unless vetted and considered by the ESG Committee. Facilitation payments: Are a recognised form of bribery, no such payments shall be made to expedite or to secure the

OECD Guidelines, FATF Recommendations, EU Directives, KYC Practice
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kind) whether to a public official or a private individual;
- We never offer, provide or authorise bribes of any kind, including facilitation payments, either directly or indirectly, to a public official or a private individual;
- We never request or accept bribes of any kind, either directly or indirectly;
- We ensure we record accurately and in accordance with the appropriate financial laws and regulations, each transaction with all entities.

➢ Sponsorships, charitable contributions and community investments, political campaigns:
- We never make a sponsorship, charitable contribution or community investment in order to disguise a bribe, or to gain an improper business advantage;
- We ensure that before we enter into sponsorships, community investments or make charitable contributions we conduct risk-based due diligence;
- We monitor the appropriate use of our funds or resources;
- We do not seek to influence the political process by improper or corrupt means. To mitigate this risk, we do not contribute any funds or resources towards any political campaign, political party, political candidate or any politically affiliated organization.

performance of a routine governmental action such as issuing permits, licenses, or other official documents; providing customs clearances; providing police protection; providing utility services; or handling cargo. Payments made under duress and extortion: Cometa will not place at risk its employees or contractors. Any such incident shall be reported to the ESG Committee. Gifts and entertainment: Cometa endorses proper management of the giving and acceptance of gifts and entertainment to avoid the risk they present of actual or perceived bribery or corruption.

Cometa only gives or accept gifts and entertainment that firstly, are qualified by the ESG Committee and secondly that:
- in good faith, occasional, reasonable and appropriate
- a normal business courtesy, and
- transparent. We don’t give or accept gifts and entertainment:
  - with the intent or prospect of influencing decision-making or other conduct
  - with the intent obtaining any improper or undue advantage
  - which are reasonably capable of being regarded in any way as a bribe, or
  - in the form of cash, which includes pre-paid cards or gift cards which can be redeemed for cash.

Transfer Pricing

☐ Transactions between Cometa and its group of companies must comply with the arm’s length principle as defined in the Organisation for Economic Co-operation and Development (OECD) Transfer Pricing Guidelines for Multinational Enterprises and Tax Administrations and included
Governance: Transparency, Data Privacy Procedures and Controls

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in Article 9 of the OECD Model Tax Convention. Cometa takes cognizance that there are no exceptions to this rule.

☐ Additional and further required policies relating to our transfer pricing practice are housed on physical file at Cometa Head Office.

Fraud Policy

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<th>Our Commitment</th>
<th>Procedures and Controls</th>
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<td>We do not allow for or commit fraud, engage in fraudulent behaviour nor willingly or knowingly assist or facilitate any third party to commit fraud.</td>
<td>We require employees to be alert to any unusual or suspicious arrangements which could expose us to the risk of fraud and to report any such arrangements to Compliance. Depending on the severity of the breach, consequences may range from a warning to termination of employment.</td>
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<td>✓ We understand the importance of our role in detecting and preventing fraud if it should happen to occur and therefore have put in place the necessary procedures, controls and management risk strategies to govern internal prevention and detection.</td>
<td>Cometa and its employees do not condone nor prohibit any form of fraud, in terms of the definition of fraud under the laws of jurisdictions in which it operates, including but not limited to acts of:</td>
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<td>• destroying, manipulating, altering, or forging company records;</td>
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<td>• manipulating financial or accounting records</td>
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<td>• knowingly creating ‘fake’ contracts which do not reflect the true nature of the contractual relationship, such as contracts that we have no intention of performing, or contracts that do not accurately describe the intended transaction</td>
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<td>• backdating contracts to misrepresent the signature date</td>
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<td>• knowingly creating or paying false claims or invoices</td>
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• falsifying or duplicating expense claims, and
• deliberately misrepresenting, concealing or not disclosing material facts relevant to a decision or transaction.

Local Procurement Policy
☐ Cometa places communities at the centre of its business practice, keeping in line with the domestic mining legislation and directives on commodities and locally procured good, we make every reasonable effort to procure all goods and services locally.

- Non-local purchases shall require requisite approval.
- Beyond local ownership, we will drive strategic partnerships which create local employment, skills transfer, and economic value-add.
- We should actively develop local suppliers to create capacity and capability.
- We will seek to create competitive, and diverse options for supply that can sustain beyond life of mine.
- Implementation will require extensive internal and external engagement.

Data Protection & Privacy
☐ . Cometa commits to compliance with the requirements of data protection laws and regulations applicable to Cometa in the countries in which it, or a third party supplier on its behalf, processes personal data.

1. Applicability: This Policy applies to all Cometa employees and all third-party suppliers who receive or have access to personal data from Cometa or who provide information to COMETA, regardless of geographic location.

2. Principles:
   2.1 Cometa will ensure that privacy and data protection compliance standards be adhered to across all employee management systems and processes.
   2.2 Cometa has adopted the following principles to govern its processing of personal data (except as specifically provided by this Policy or as required by the applicable laws):
      2.2.1 Personal data will be processed fairly and lawfully;
      2.2.2 Personal data will be obtained only for specified and lawful purposes and will not be further processed in any way that is considered incompatible with those purposes; Personal data will be adequate, relevant and not excessive in relation to the purposes for which it is processed;
      2.2.3 Personal data will be accurate, complete and current as appropriate to the purposes for which it is collected and/or processed as far as is reasonably practical; Personal data shall not be kept in a format which allows for the
2. Identification of the employee for longer than necessary for the specified purpose;

2.3 Personal data shall not be collected or processed unless:
   2.3.1 The employee has provided a valid, informed consent where required;
   2.3.2 Processing is necessary for the fulfilment of the employment relationship;
   2.3.3 Processing is necessary for compliance with an COMETA legal obligation;
   2.3.4 Processing is necessary in order to protect the employee’s interests;
   2.3.5 Processing is necessary for the performance of a public interest activity;
   2.3.6 Personal data shall be collected and processed in accordance with the rights of the employee.

3. Appropriate measures shall be taken to:
   3.1 Prevent and/or to identify unauthorised or unlawful collection, processing, transmittal of personal data; and
   3.2 Prevent accidental loss or destruction of, or damage to personal data.

4. Standard Employee Consent
   4.1 COMETA will ensure a system for the collection and documentation of employee consent for the processing and transfer of personal data.
   4.2 Consent with respect to sensitive data shall refer expressly to the data being processed. Sensitive data includes race/ethnic origin, union membership, health information and criminal convictions.

5. Transfer of Personal Data:
   5.1 Personal data shall not be transferred to another entity or country unless reasonable steps have been taken to maintain the required level of data protection (being the same or better than the current level of protection offered).
   5.2 Personal data may be communicated to third persons only for the purpose for which it was originally collected or for other legal purposes.
   5.3 All transfers to third parties shall be subject to written agreements setting out clear obligations on the third party to provide the same level of protection to the personal data as offered by COMETA.
   5.4 Notwithstanding the above, personal data may only be transferred where any of the following apply:
      5.4.1 The employee has given prior written consent to the proposed transfer;
      5.4.2 The transfer is necessary for the fulfilment of the relationship between the employee and COMETA;
      5.4.3 The transfer is required by law; or
      5.4.4 The transfer is necessary in order to protect the employee’s vital interests.

6. Employee Access Rights:
   6.1 COMETA shall establish a system to enable and facilitate employee access rights to their personal data.
   6.2 Employees shall be entitled to obtain the following information about their own personal data upon a request made in compliance with the specific procedure established:
      6.2.1 Whether COMETA has stored personal data regarding them;
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6.2.2 Access to personal data stored concerning them;
6.2.3 The sources through which the personal data was obtained;
6.2.4 Whether any data held on them is sensitive data;
6.2.5 The purpose that motivated the collection of the personal data;
6.2.6 The recipients of the collected personal data;
6.2.7 How corrections will be made if the data held is incorrect;
6.2.8 That personal data held on them be kept up-to-date;
6.2.9 The removal of their personal data where factually inaccurate;
6.2.10 The confidential treatment of their personal data;
6.2.11 A copy of the consent given to COMETA by the employee allowing the processing of their personal data;
6.2.12 The withdrawal of consent given that allows the processing of their personal data.

6.3 COMETA shall provide its response to a request under section 6.2 within ten (10) days of receipt of the request. Where the request concerns the update, removal and/or confidential treatment of their personal data, COMETA shall provide its response within five (5) days of receipt of such a request.

6.4 During the process of reviewing, correcting or verifying any personal data, COMETA will ensure that the file containing such data is either blocked or is clearly stated as being under review.

6.5 Notification COMETA shall not process personal data without notification to the relevant data protection authorities in countries which require such notification.

7. Third Party Processors

7.1 Where COMETA relies on others to assist in its processing activities, COMETA will choose a data processor that provides sufficient security measures and takes reasonable steps to ensure compliance with those measures.

7.2 COMETA shall enter into written contracts with each data processor requiring it to comply with data privacy and security requirements imposed on COMETA by law and with this Policy.

7.3 As part of COMETA’s internal data auditing process, COMETA shall conduct regular checks on processing by third party processors, especially in respect of security measures. Security COMETA shall adopt physical, technical, and organizational measures to ensure the security of personal data, including the prevention of their alteration, loss, damage, unauthorized processing or access, having regard to the state of the art, the nature of the data, and the risks to which they are exposed by virtue of human action or the physical or natural environment.

8. Retention All employees must observe the COMETA data retention policy. COMETA will delete personal data after a reasonable time and will ensure that it does not keep personal data for longer than is necessary for the purpose for which it is being held except where it is necessary to keep it indefinitely or the law requires it be kept for a certain time. When COMETA no longer needs to keep such personal data it will destroy it as soon as reasonably practicable.
We refer you to our various policies and specifically the policies governing our good governance principles on anti-money laundering, anti-corruption, anti-bribery and fraud.