

JSK Holdings (Pty) Ltd

Physical Address :

2 Amber Rd Elandsfontein
Germiston
South Africa 1401

Tel: +27 (0) 10 023 2896

Fax: +27 (0)11 776 9235

Email : info@jskh.co.za



JSK Holdings was founded on the principles of fairness and respect to all. The same principles and values of JSK Holdings are expected to also be embraced by all its employees and become shared values between JSK Holdings and the customers and suppliers around the world. JSK Holdings is a supplier of metals, minerals and ores to various industries in the metallurgical sector globally. Most of the resources and commodities that customers can purchase from JSK Holdings are from Africa. Though our sourcing and purchasing of resources and commodities will not be limited to Africa only.

JSK Holdings is committed to complying with the **OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas**. Recognizing that risks of significant adverse impacts which may be associated with extracting, trading, handling and exporting minerals from conflict-affected and high-risk areas (CAHRA), and recognising that JSK Holdings has the responsibility to respect human rights and not contribute to conflict, therefore, JSK Holdings commits to adopt, widely disseminate and incorporate in contracts and/or agreements with suppliers the following policy, as representing a common reference for conflict-sensitive sourcing practises and suppliers' risk awareness from the point of extraction until end user. JSK Holdings commits to refraining from any action which contributes to the financing of conflict, and also makes a commit to comply with relevant United Nations sanctions resolutions or, where applicable, domestic laws implementing such resolutions.

JSK Holdings supports all due diligence, traceability, risk recognition and mitigation methods to comply with the [US Dodd Frank conflict minerals law 1502](#) and to the [EU Minerals Due Diligence regulation 2017](#) and commit to support all our customers with the [Responsible Minerals assurance process \(RMAP\)](#)

We commit to following the OECD model supply chain policy Annex II as laid out below:

- Serious abuses associated with the extraction, transport or trade of minerals:
- While sourcing from, or operating in, conflict-affected and high-risk areas (CAHRA), JSK Holdings will neither tolerate nor by any means profit from, contribute to, assist with or facilitate the order by any party of:
any forms of torture, cruel, inhuman and degrading treatment;
- any forms of forced or compulsory labour, which means work or service which is exacted from any person under the menace of penalty and for which the person has not offered himself voluntarily;
- the worst forms of child labour;
- other gross human rights violation and abuses such as widespread sexual violence;
- war crimes or other serious violations of international humanitarian law, crimes against humanity or genocide.

Risk management of serious abuses:

As per our JSK Holdings Management due diligence programme (see separate document), JSK Holdings will immediately suspend or discontinue engagement with upstream suppliers where we identify a reasonable risk that they are sourcing from, or linked to, any party committing serious abuses.

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Direct or indirect support to non-state armed groups:

JSK Holdings will not tolerate any direct or indirect support to non-state armed groups through the extraction, transport, trade, handling or export of minerals. Nor procuring minerals from, making payments to or otherwise providing logistical assistance or equipment to, non-state armed groups or their affiliates who;

- illegally control mine sites or otherwise control transportation routes, points where minerals are traded and upstream actors in the supply chain; and/or
- illegally tax or extort money or minerals at points of access to mine sites, along transport routes or at points where minerals are traded; and/or
- illegally tax or extort intermediaries, export companies or international traders.

As per our JSK Holdings Management due diligence programme (see separate document), JSK Holdings will immediately suspend or discontinue engagement with upstream suppliers where we identify a reasonable risk that they are sourcing from, or linked to, any party providing direct or indirect support to non-state armed groups.

Direct or indirect support to public or private security forces:

JSK Holdings agrees to eliminate, direct or indirect support to public or private security forces who illegally control mine sites, transportation routes and upstream actors in the supply chain; or illegally tax or extort intermediaries, export companies or international traders.

JSK Holdings recognise that the role of public or private security forces at the mine sites and/or surrounding areas and/or along transportation routes should be solely to maintain the rule of law, including safeguarding human rights, providing security to mine workers, equipment and facilities, and protecting the mine site or transportation routes from interference with legitimate extraction and trade.

Bribery and fraudulent misrepresentation of the origin of minerals:

JSK Holdings will not offer, promise, give or demand any bribes, and will resist the solicitation of bribes to conceal or disguise the origin of minerals, to misrepresent taxes, fees and royalties paid to governments for the purposes of mineral extraction, trade, handling, transport and export.

Money laundering:

JSK Holdings will support efforts, or take steps, to contribute to the effective elimination of money laundering, where JSK Holdings identifies a reasonable risk of money laundering resulting from, or connected to, the extraction, trade, handling, transport or export of minerals or money derived from the illegal taxation or extortion of minerals along the supply chain, JSK Holdings will immediately suspend or disengage from the supplier.

Non-payment of taxes and royalties due to governments:

JSK Holdings will ensure that all taxes, fees, and royalties related to mineral extraction, trade and export from CAHRA regions are paid to governments and, in accordance with the company's position in the supply chain, we commit to disclose such payments in accordance with the principles set forth under the Extractive Industry Transparency Initiative (EITI).

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To summarize; in accordance with the specific position of JSK Holdings in the supply chain, JSK Holdings and its directors commit to engage with suppliers, central or local governmental authorities, international organisations, civil society and affected third parties, as appropriate, to improve and track performance with a view to preventing or mitigating risks of adverse impact through measurable steps taken in reasonable timescales. JSK Holdings will suspend or discontinue engagement with upstream suppliers after failed attempts at mitigation to stop any untoward behaviour that may be in violation with this policy and the values of JSK Holdings.

Whistle-blowing policy:

For full details, please refer to the JSK Holdings General Whistleblowing Policy document. Whistle blowers can get in contact with the senior managers at our company by:

Email: whistleblower@jskh.co.za

Phone: The Due diligence manager on +27 82 466 1974

The Chief Operations Manager on +27 73 616 1012

Address for correspondence is:

JSK Holdings, 2 Amber road, Elandsfontein, Germistin South Africa.