

Report

LBMA Refiner's Compliance Report

The *LBMA Responsible Gold Guidance*¹ and the *LBMA Responsible Silver Guidance*² have been established for Good Delivery Refiners to adopt high standards of due diligence to combat systematic or widespread abuses of human rights, to avoid contributing to conflict, to comply with high standards of anti-money laundering and to combat terrorist financing practice.

This report summarizes how **Kennecott Utah Copper LLC** (hereafter "RTK"), a refiner of gold and Good Delivery Refiner for silver, has complied with the requirements of the LBMA Responsible Gold Guidance and the LBMA Responsible Silver Guidance (henceforth "LBMA Responsible Gold / Silver Guidance").

Refiner's name:	Kennecott Utah Copper LLC
CID number	CID000969
Location:	Kennecott Utah Copper, Refinery 11500 W 2100 S, Magna, Utah, 84044, USA
Reporting year-end:	31 December 2025
Date of Report:	01 March 2026
Senior management responsible for this report:	Nate Foster Managing Director nate.foster@riotinto.com +1 406 539 2563

RTK's evaluation

Materials in scope: Gold and Silver

The following table lists the minimum requirements that must be satisfied by Refiners in accordance with the LBMA Responsible Gold / Silver Guidance to demonstrate compliance.

¹ Responsible Gold Guidance V9, November 2021, <https://www.lbma.org.uk/publications/responsible-gold-guidance-v9>

² Responsible Silver Guidance V2, November 2023, <https://www.lbma.org.uk/publications/lbma-responsible-silver-guidance-v2>

TABLE 1: SUMMARY OF ACTIVITIES TO DEMONSTRATE COMPLIANCE

STEP 1: COMPANY MANAGEMENT SYSTEMS

RTK has fully complied with Step 1: Establish strong management systems. RTK is owned and operated by the Rio Tinto Group (“Rio Tinto”) and therefore uses and applies both its own and Rio Tinto management systems for business operations.

1.1 Has the Refiner adopted a supply chain policy regarding due diligence for supply chains of gold and/or silver?	
Yes	The RTK’s Responsible Minerals Sourcing Policy, reviewed in February 2026, covers gold, silver, and all other minerals. The policy was approved by Managing Director of RTK, Nate Foster, and is reviewed annually, and updated when required. The policy reaffirms our consistent approach in managing conflict minerals in our supply chain, which is materially aligned with the due diligence framework and the principles of the policy model set out in Annexes I and II of the <i>OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict Affected and High Risk Areas</i> (OECD Guidance), the requirements for responsible metal production and sourcing set out in the Copper Mark Criteria for Responsible Production and the principles set out in the LBMA Responsible Gold / Silver Guidance. Link to policy, in English, on corporate website: https://www.riotinto.com/en/operations/us/kennecott.

1.2 Has the Refiner set up an internal management structure to support supply chain due diligence?

Yes

Organizational Structure & Accountability:

As RTK is a member of the Rio Tinto, it operates according to the Rio Tinto overarching global code of business conduct, *The Way We Work*, which sets out the principles and standards that affirm our commitment to corporate responsibility. These principles include compliance with applicable laws everywhere we work, respect for human rights, anti-corruption and anti-bribery, and other responsible business practices.

RTK has implemented and aligned Rio Tinto's Management System Standards under the Rio Tinto framework. Supply chain due-diligence requirements are embedded within this existing framework to ensure effective implementation, internal alignment, and operational efficiency.

Standard Work Instructions and Procedures (SWI/SWP) outlining the requirements and responsibilities for supply chain due diligence are incorporated into RTK's HSEQ Management System.

Management Review of the Due Diligence Management System or Third Party Risk Management (TPRM) program is conducted periodically by the TPRM Committee. The periodic review is to provide assurance that it is effective, compliant and aligned with organisational goals. TPRM Committee, chaired by Rio Tinto Chief Ethics and Compliance Officer with the Chief Legal Officer, Governance & Corporate Affairs as the Executive Committee sponsor, has been established as a management committee to oversee the TPRM framework, formulate and decide on the policy and the implementation of the TPRM program.

Role of RT Commercial Americas Inc (RTCA)

In the context of precious metals sales where products transfer from RTK to Rio Tinto Commercial Americas Inc (RTCA), it is noted that RTCA has adopted an Anti-Money Laundering (AML) policy in accordance with U.S. Treasury Department Financial Crimes Enforcement Network (FinCEN) requirements applicable to Dealers in Precious Metals. As RTCA is the contracting entity for all third-party precious metals sales and logistics arrangements, its AML program provides an additional layer of compliance oversight for downstream commercial activities.

This RTCA-administered AML framework complements—without replacing—RTK's own due-diligence approach as a Producer of precious metals. RTK continues to manage upstream and supply-chain due diligence through Rio Tinto's Business Integrity Standards, the KYTP Procedure, TPDD-supported reviews, and associated internal controls.

Resources & Skills:

The management team comprises employees from RTK, Rio Tinto Commercial (Copper Sales & Marketing and Commercial Services & Digital), and the Ethics and Compliance Third Party Due Diligence (TPDD) team. This structure supports effective communication, implementation of due-diligence requirements, and continuous monitoring of supply-chain activities.

	Training: During the reporting period, over 90% of relevant employees received training on supply chain due diligence, responsible minerals sourcing, third-party risk management, standard operating procedures, and reporting/disclosure requirements. Training topics are tailored to the company's due diligence structure and supply chain context. Rio Tinto's '<i>Supplier Code of Conduct</i>' sets out expectations of suppliers and their subsidiaries and subcontractors with respect to key issues, including conflict minerals and human rights. Cash Payment & Record-Keeping Policies: RTK does not accept cash payments for precious metals sales; all transactions are conducted through official banking channels. Record-keeping policies require retention of supply-chain documentation for a minimum of five years, with any deviations justified and documented. Public Availability: Both '<i>The Way We Work</i>' and '<i>Supplier Code of Conduct</i>' are accessible on our external website at https://www.riotinto.com/footer/suppliers.
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1.3 Has the Refiner established a traceability system over gold and/or silver supply chains, including chain of custody mapping and identification of supply chain actors?

Yes	RTK has a robust process, and specific documents must be received, and transactional details entered before RTK process copper concentrates (including third party concentrates). RTK operates mining and metals processing facilities for the extraction of copper and other metals. Once ore is extracted and milled, concentrate is processed in a smelter to produce copper anodes, which are further refined into copper cathodes. Gold, silver, and other precious metals are captured in the electrolytic slime during the copper refining process. The electrolytic slime is transferred to the precious metals plant, where gold and silver are produced. The process and procedure for precious metal sale and procurement of third-party copper concentrates are documented in the respective Standard Operating Procedure (SOP): • MKTGSOP-001 Standard Operating Procedure Precious Metals Order Management, which has a defined records retention period of a minimum 5 years, staff accountability on precious metal sourcing, and requirements on anti-money laundering for new and existing customers. • MKTGSOP-002 Operating Procedure External Raw Material Purchasing, which requires a Certificate of Origin (CoO) to be obtained and reviewed by the Sales Manager prior to purchase of third-party copper concentrates. The CoO must be on the supplier's letterhead, and include the contract number(s), and applicability of the CoO to the contract(s). This is to ensure the concentrate does not originate and does not transit via a conflict-affected or high-risk area (CAHRA). In addition, suppliers have to acknowledge and conform to RTK's Responsible Minerals Sourcing Policy, which is materially aligned with Annexes I and II of OECD Guidance. Transfer documents are generated electronically in the Rio Tinto Business Solution system via the Invoicing process. This ensures transfer documents, tie directly to orders and that the correct information is always included in the document. The invoice will indicate the customer to whom the material has been sold. A 'Release Document Template' is used to strengthen the link between transfer documentation and physical movement of material, providing additional information, including on traceability.
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	RTK has maintained annual training programs for all staff involved in the gold and silver supply chain. For the year under review, more than 90% of relevant employees were trained in the supply chain due diligence matters including responsible minerals sourcing policy, alignment with management system, third-party risk management, SOP, and reporting and disclosure. RTK does not require an Anti-Money Laundering (AML) policy because it is a Producer of precious metals and it does not meet the criteria to be a Dealer of precious metals. For all purchases of gold, gold bearing slimes or feed and for third party copper concentrates with payable gold, RTK addresses risks by requiring the Sales Manager, under Rio Tinto's Business Integrity Standards (GOV-B-001), Business Integrity Procedure (GOV-C-002) and Know Your Third Party (KYTP) Procedure (GOV-C-006), to conduct due diligence review, through the help of the Ethics and Compliance Third Party Due Diligence (TPDD) team, on each new and existing third party with regard to a set of requirements aimed at ensuring third parties are not involved in money laundering, or other criminal activities such as terrorism, fraud and corruption. RTK does not accept cash for precious metals-related sales; all payments are through an official banking system; Customers must acknowledge this policy in writing. RTK supports the implementation of the Extractive Industries Transparency Initiative (EITI) principles. This commitment is reflected in Rio Tinto's broader transparency and ethics practices, as outlined on the company's website: https://www.riotinto.com/en/sustainability/ethics-compliance/transparency For the year under review, no incident relating to counterparties' identification, origin, and traceability of precious metals was reported.
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1.4 Has the Refiner strengthened company engagement with gold and/or silver supplying counterparties, and, where possible, assisted gold and/or silver supplying counterparties in building due diligence capabilities?

Yes	All gold and silver produced from RTK was derived from refining copper mining co-product (anode slimes). No externally procured copper feedstock of the refinery is sourced from or has transited through CAHRAs. No externally procured recycled gold or silver is used in the process. Rio Tinto has developed a comprehensive supplier identification process. Prior to engagement with a potential supplier, each supplier is subject to a risk-based third party due diligence assessment in accordance with the Know Your Third Party (KYTP) Procedure. Our KYTP Procedure is the overarching guidance for our supplier due diligence process. This facilitates identification of the potential risks regarding our supplier relationships, whether these risks relate to human rights issues, including modern slavery, bribery and corruption, money laundering, trade sanctions or denied party transactions. Due diligence checks are performed for all new suppliers meeting the KYTP risk criteria, as well as for renewals of contracts and engagements with existing suppliers in higher risk jurisdictions meeting certain risk criteria. The Ethics and Compliance Third Party Risk Management (TPRM) team conducts system-based ongoing monitoring of existing suppliers centrally which includes monitoring of enforcement actions, sanctions-related alerts and significant changes in counterparty data. For third party copper concentrate that contains gold and/or silver, a specific clause that requires adherence to RTK's Responsible Minerals Sourcing Policy is included in supplier contracts.
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1.5 Has the Refiner established a company-wide confidential grievance mechanism?

Yes	Rio Tinto has developed a confidential grievance mechanism allowing any employee or external stakeholder to anonymously voice concerns, including over the gold and silver supply chains or any identified risk. RTK has established a SOP: RTK Operational grievance Mechanism (Doc. No. 99000-STD-00001) to document the way RTK deals with all external inquiries in a consistent and appropriate way. The SOP also outlines the accountable role and appropriate response. Rio Tinto is committed to creating a culture of transparency and encourages our employees, contractors, and other partners, including community members, to speak up about their issues and concerns, either through management, our Human Resources or Ethics and Compliance teams, through our confidential and independently operated whistleblowing service 'myVoice' (<i>EthicsPoint</i> - Rio Tinto: https://secure.ethicspoint.eu/domain/media/en/gui/111839/index.html) or community complaints and grievance mechanisms. Whenever a complaint or grievance is received, the accountable role/ personnel investigate, determine, and implement an appropriate response. The response and any communication are captured in <i>EthicsPoint</i> or the Rio Tinto Business Solution (RTBS) system. For the year under review, 98 cases of grievances were received by the program. All grievances are categorized in <i>EthicsPoint</i> or RTBS system, but none of the cases related to mineral supply chain purchases in regards the conditions of extraction, transport, trade, and export.
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STEP 2: RISK IDENTIFICATION AND ASSESSMENT

RTK has fully complied with Step 2: Identify and assess risks in the supply chain.

2.1 Does the Refiner have a due diligence process to identify risks in the supply chain?

Yes	Rio Tinto identifies and assesses risks in the supply chain. Rio Tinto has a Know Your Third Party (KYTP) Procedure, which supports the Business Integrity Standard and the Procurement Standard and focuses on third party relationships with suppliers and other third party engagements. It is further supported by the standards and expectations set out in Rio Tinto's 'The Way We Work' and 'Supplier Code of Conduct'. The KYTP Procedure is the overarching guidance for our supplier due diligence process. This facilitates identification of the potential business integrity risks regarding our supplier relationships, whether these risks relate to human rights issues, including modern slavery, bribery and corruption, money laundering, trade sanctions, denied party transactions, other financial crimes or other reputational risks. These risks are highlighted in Annex II of the OECD Guidance. Risk-based due diligence checks are performed for all new suppliers meeting the KYTP risk criteria, as well as for renewals of contracts and engagements with existing suppliers in higher risk jurisdictions meeting certain risk criteria. The Ethics and Compliance Third Party Risk Management (TPRM) team conducts system-based ongoing monitoring of existing suppliers centrally which includes monitoring of enforcement actions, sanctions-related alerts and significant changes in counterparty data. In addition, RTK's approach in managing conflict minerals in its supply chain, as outlined in the Responsible Minerals Sourcing Policy, is also materially aligned with the due diligence framework and the principles of the policy model set out in Annexes I and II of the OECD Guidance. MKTGSOP-002 Operating Procedure External Raw Material Purchasing requires
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suppliers to acknowledge and adhere to Responsible Minerals Sourcing Policy prior to entering any business relationship with the suppliers.

These processes are formal requirements before entering into a business relationship with any materials (including third party copper concentrates) supplying counterparty.

2.2. How does the Refiner classify identified risks in light of the standards of its due diligence system?

Rio Tinto conducts supply chain due diligence following a risk-based approach before entering a business relationship with any materials (including third party copper concentrates) supplying counterparty. Rio Tinto have systems and processes in place to perform enhanced due diligence for higher-risk categories, as well as assessing whether materials originate from or transit via a CAHRA. In addition, the Ethics and Compliance Third Party Risk Management (TPRM) team conduct appropriate scrutiny and ongoing monitoring of all existing third parties through the course of the relationship.

RTK operates mining and metals processing facilities for the extraction of copper and other metals. Once ore is extracted and milled, concentrate is processed in a smelter to produce copper anodes, which are further refined into copper cathodes. Gold, silver, and other precious metals are captured in the electrolytic slime during the copper refining process. The electrolytic slime is transferred to the precious metals plant, where gold and silver are produced. The copper materials entering the process are sourced from RTK's Bingham Canyon Mine and third-party copper concentrates, or other copper bearing materials. These may also contain gold and/or silver.

For all purchases of third party copper concentrates with payable gold, the Sales Manager, under Rio Tinto's Business Integrity Standards (GOV-B-001), Business Integrity Procedure (GOV-C-002) and Know Your Third Party (KYTP) Procedure (GOV-C-006), conducts a due diligence review, through the help of the Ethics and Compliance TPRM team, on each new and existing third party with regard to a set of requirements aimed at ensuring third parties are not involved in money laundering, or other criminal activities such as terrorism, fraud and corruption.

For the year under review, no high-risk suppliers were identified. No third-party copper concentrates were sourced from or have transited through CAHRA.

2.3 Has the Refiner undertaken EDD measures for identified high-risk supply chains?

For the year under review, no RTK supplier was assessed as high risk, and with no high-risk indicators that would trigger EDD, as contemplated in the LBMA Responsible Gold / Silver Guidance.

The Ethics and Compliance TPRM team provides the third party due diligence assessment report to the relevant Rio Tinto relationship owner. If significant risks are identified during the due diligence assessment, the report will be escalated to the relevant Subject Matter Experts (SME) and the regional Ethics and Compliance contact. Trading may be paused pending outcome of this enhanced due diligence. A quarterly summary report of risk assessment and due diligence conduct is sent to relevant KYTP stakeholders. The General Manager (GM) – Copper Products Sales, representing senior management, must approve any new suppliers, and for any new suppliers classified as high risk, approval must be obtained from both the relevant GMs and the Rio Tinto Chief Ethics and Compliance Officer. Senior management retains the ultimate control and go/ no-go decision authority for the gold/ silver supply chain.

The Ethics and Compliance TPRM team conducts system-based ongoing monitoring of existing suppliers centrally, which includes monitoring of enforcement actions, sanctions-related alerts and significant changes in counterparty data.

RTK does not procure recycled gold or silver from third parties. RTK does not purchase any mined gold from State Owned Enterprise or have any cooperation with national or local government authorities.

STEP 3: RISK MANAGEMENT

RTK has fully complied with Step 3: Design and implement a management system to respond to identified risks.

Does Refiner have a process to respond to the identified risks by either (i) mitigating the risk while continuing to trade, (ii) mitigating the risk while suspending trade or (iii) disengagement from the risk?

Rio Tinto has devised and adopted an appropriate strategy for risk management of any identified risk based on the standards and expectations set out in Rio Tinto's '*The Way We Work*' and '*Supplier Code of Conduct*'. Due diligence checks are performed for all new suppliers meeting the KYTP risk criteria, as well as for renewals of contracts and engagements with existing suppliers meeting certain risk criteria. Ethics and Compliance Third Party Risk Management (TPRM) team conduct system-based ongoing monitoring of existing suppliers centrally which include monitoring of enforcement actions, sanctions-related alerts and significant changes in counterparty data.

In addition, MKTGSOP-002 Operating Procedure External Raw Material Purchasing requires suppliers to acknowledge and adhere to RTK's Responsible Minerals Sourcing Policy. The strategy in managing conflict minerals in supply chain, outlined in the Responsible Minerals Sourcing Policy, is materially aligned with the due diligence framework and the principles of the policy model set out in Annexes I and II of the OECD Guidance. In the event of an identified risk, the Sales Manager will be notified, and the Sales Manager will require the supplier to declare that the material meets the requirements of the OECD Guidance. If the material does not meet the OECD Guidance, RTK could choose to disengage from the risk.

The strategy created allows Rio Tinto to manage identified risk through rigorous risk assessment and investigation (and where required, enhanced due diligence) prior to engaging in a business relationship with a third-party material (including copper concentrate) supplying counterparty.

In the reporting year, RTK did not identify any suppliers with high-risk level, which warrant additional risk mitigation steps to be taken. The procedure for risk mitigation as described above is strictly applied when and where necessary.

STEP 4: INDEPENDENT THIRD-PARTY ASSURANCE

RTK has fully complied with Step 4: Independent third-party assurance of the supply chain due diligence.

RTK engaged the services of the assurance provider ARCHE Advisors. Their independent limited assurance report can be viewed on Rio Tinto's website once issued. www.riotinto.com.

In addition, RTK maintains participation in the Responsible Minerals Initiative (RMI) Responsible Minerals Assurance Process (RMAP). RTK successfully completed an independent RMAP assessment conducted on 10–11 March 2025, and public reports relating to Kennecott's responsible sourcing and due diligence programme are available through the Responsible Minerals Initiative website: <https://www.responsiblemineralsinitiative.org/media/docs/Public%20Reports/Kennecott%20LLC%20Public%20Report.pdf>

Prior audit reports for LBMA Responsible Gold / Silver certificates are available on the LBMA website (<http://www.lbma.org.uk/good-delivery-list>).

STEP 5: REPORT ON SUPPLY CHAIN DUE DILIGENCE

RTK has fully complied with Step 5: Report on supply chain due diligence.

For the year under review, the third party due diligence assessment conducted of RTK third parties within the scope of this report, did not identify any material risks.

Our Responsible Minerals Sourcing Policy, and independent third-party audit report are publicly available on our website <https://www.riotinto.com/operations/us/kennecott>. Statistics on due diligence conducted by Rio Tinto's Ethics and Integrity department are reported in the annual Sustainability Report and can be viewed on Rio Tinto's website (www.riotinto.com).

REFINER TRANSPARENCY ROADMAP

As Kennecott Utah Copper LLC is not listed on the LBMA Good Delivery List for gold, the enhanced transparency disclosures required under the LBMA Refiner Transparency Roadmap are not mandatory. RTK remains committed to responsible sourcing and transparency in line with applicable LBMA and OECD guidance.

Country of Origin Form:

RTK submits the *Country of Origin Form* for both gold and silver annually via the Gold Bar Integrity (GBI) platform, in accordance with LBMA requirements. This process ensures comprehensive documentation of the origin of all gold and silver materials processed by RTK, supporting transparency and traceability in our supply chain.

Ongoing Disclosure:

RTK is committed to ongoing due diligence and transparency in its supply chain management. The company regularly reviews its responsible sourcing practices, engages proactively with stakeholders, and updates relevant policies and disclosures as part of its continuous improvement efforts.

TABLE 2: MANAGEMENT CONCLUSION

Is the Refiner in compliance with the requirements of the LBMA Responsible Gold/Silver Guidance for the reporting period?	
Yes	In conclusion, RTK implemented effective management systems, procedures, processes and practices to conform to the requirements of the LBMA Responsible Gold/ Silver Guidance, as explained above in Table 1, for the reporting year ended 31 December 2025. RTK is committed to continuous improvement, and any corrective actions identified will be monitored internally on a regular basis. Corrective Action Plans are communicated separately to the LBMA Executive, in its role as administrator of the LBMA Responsible Gold/ Silver Guidance.

TABLE 3: OTHER REPORT COMMENTS

If users of this report wish to provide any feedback to RTK with respect to this report, they can contact the Sales and Marketing team at Kennecott.Sales@riotinto.com.