

ACG Metals Limited

Gifts and Hospitality

7 April 2026

Introduction

ACG Metals Limited and its group companies (collectively "ACG Metals") is committed to conducting its business responsibly, with integrity and upholding the highest ethical standards. It is our policy to conduct all of our business in an honest and ethical manner.

This Policy is designed to protect you, and ACG Metals, from allegations of wrongdoing and ensure we all comply with the law and best practice in instances of receiving or offering gifts and hospitality services to third parties. It should be read and applied together with our wider set of compliance policies which provide further detail, guidance and instruction on relevant topics, in particular our Anti-Bribery and Corruption Policy.

Scope

This Policy applies to all directors, officers and employees of ACG Metals, wherever located, as well any person or company acting on behalf of ACG Metals, whether as an associate, contractor, consultant, agent, or otherwise (together "Relevant Persons"). All Relevant Persons are expected to work together with us to uphold our commitment to doing business without compromising ethical standards.

We also expect the suppliers and third parties that we work with (but may not control or supervise) to abide by the same standards. We should lead by example and encourage them to adopt a similar approach.

Policy

Gifts are any physical items of value exchanged at no cost and consumed, enjoyed, and/or used outside of business and hospitality related interactions. Typical examples include bottles of alcohol, flowers, hampers, clothing and electronic items.

Hospitality is any entertainment or activity offered or received for free - or at less than market price - including (but not limited to) meals, travel, accommodation and invitations to attend receptions, conferences, sporting, music or cultural events and recreational activities.

The custom and practice of giving and receiving gifts and hospitality varies in different parts of the world and can be an important part of developing and maintain good business relations. However, inappropriate gifts and hospitality (whether given or received) can constitute criminal behaviour in the form of bribery and corruption or create the perception of such behaviour, leading to serious consequences. Ill-judged or inappropriate gifts and hospitality, even if not illegal, can also harm business relations and cause serious reputational and commercial risks.

ACG Metals will accordingly only permit gifts and hospitality to be accepted or offered that are in accordance with all applicable laws and which are reasonable, proportionate, transparent and given in good faith.

To avoid any suggestion of bribery, we need to be conscious of the intentions behind the gifts and hospitality that we provide and that are offered to us. You should never ask for or encourage the provision of hospitality or gifts.

Examples of scenarios that might present a risk are:

- A potential or existing supplier offering lavish travel and accommodation to an event with little business purpose – this may be an attempt to gain improper influence over Relevant Persons when they are making decisions about awarding or extending contracts.
- A potential business partner providing frequent gifts and hospitality to Relevant Persons – this could be an attempt to manoeuvre a Relevant Person into a position of obligation, for example to win a contract, gain insider information, or to pave the way for larger bribery and corruption.
- A Relevant Person inviting a public official who is involved in making permit decisions to a sporting event – this may be seen as an attempt to influence the public officials decision making powers in granting permits for Company activities.

Approval process ACG considers a gift or hospitality will only be appropriate where:

- It complies with all applicable laws and could not be capable of being regarded in any way as a bribe
- It is for reasons related to ACG Metal's business
- It constitutes a normal business courtesy (such as paying for a meal or shared taxi) and is not lavish or extravagant in the context
- It is recorded and approved in advance where necessary (see below) or otherwise capable of being approved and reclaimed in accordance with the appropriate business expense policies and procedures
- There is no intent or prospect of improperly influencing decision-making or other conduct
- It is not part of a "quid-pro-quo" or reciprocal exchange agreement
- There is no intent of obtaining any improper or undue advantage
- It is not in the form of cash or cash equivalent (such as a voucher or gift card)

If any of the following apply, the gift or hospitality must be pre-approved in writing by one of the following individuals: Chief Financial Officer, Chief Operating Officer or the Head of Legal and Compliance ("**Approved Personnel**") before it can be given or received (please see the requisite form that must be completed in Appendix 1 of this policy):

- (a) The estimated value of the gift exceeds £250 on one occasion or £1,000 over the course of a year; or
- (b) The estimated value of the hospitality exceeds £250 on one occasion or £1,000 over the course of a year; or
- (c) Hospitality is also being provided to friends or family members of the recipient; or
- (d) The recipient is a public official; or
- (e) The third party has requested the gift or hospitality.

Record keeping

Gifts or hospitality within the set limits can be offered or provided to a third party or can be accepted from a third party provided that it is appropriate to do so in the circumstances and it is in accordance with this Policy. However, all gifts and hospitality requiring pre-approval must be notified using the form in

Appendix 1 and recorded in the gifts and hospitality register. They must not be given or accepted until written approval is received.

The Head of Legal and Compliance will keep a log of requests referred to it for approval, reasons for its decisions, and details of authorised gifts and hospitality given or received.

ACG Metals will never give or receive gifts or hospitality "off-book". All invoices and/or receipts connected to gifts or hospitality offered must be provided to the finance team. The finance team will record these in the relevant accounts, books and records in accordance with applicable laws and accounting policies.

Monitoring and Reporting

ACG Metals is committed to open communication and encourages requests for guidance if you have questions about the appropriateness of gifts or hospitality offered or received.

We will periodically review our policies and procedures to ensure their effectiveness. Relevant Persons are encouraged to report any concerns. You will not face any retaliation for raising concerns, even if the concern isn't substantiated, as long as you have not knowingly made a false report. Please see our Whistleblowing Policy for further details.

Accountability

We are each accountable for ensuring that we meet our commitment to good governance, ethics and compliance. We must all make sure that we read, understand and comply with this Policy and attend any relevant training that we are invited to.

The consequences of failing to adhere to this Policy are potentially significant.

This Policy supports our values and commitment to ethical business practices. Accordingly, all suspected breaches of this policy will be taken seriously and investigated. Depending on the severity of the breach, disciplinary action may result and consequences may range from a warning to termination of employment. If the breach involves a criminal offence we may pass relevant details to the police or relevant enforcement body.

This Policy does not form part of your terms and conditions of employment and can be amended at any time.

Contact Details

If you have any questions about this policy, please contact Head of Legal and Compliance.

Document Controls:

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Appendix 1 – Notification Form

We run our business with integrity. All of us must work together to ensure our business remains untainted by bribery and corruption. This form is integral to that effort.

This form must be used in every case when:

- (a) The estimated value of the gift exceeds £250 on one occasion or £1,000 over the course of a year; or
- (b) The estimated value of the hospitality exceeds £250 on one occasion or £1,000 over the course of a year; or
- (c) Hospitality is also being provided to friends or family members of the recipient; or
- (d) The recipient is a public official; or
- (e) The third party has requested the gift or hospitality.

It is to be completed and sent to Head of Legal and Compliance.

Factor	Details
Gift/hospitality offered or requested?	[Insert]
Date gift/hospitality offered	[Insert date]
Name of person receiving or giving gift or hospitality	[Insert name]
Client/customer reference (if client or customer-related)	[Insert reference]
Nature of gift/hospitality (short description)	[Insert description]
Received or given?	☐ Received ☐ Given
Received from/given to	[Insert name]
Approximate value of gift or hospitality in this instance	[Insert value, including currency]
Approximate value of gift or hospitality over the course of the year	[Insert value, including currency]

Factor	Details
Country gift/hospitality given in	[Insert country]
Public or government official involved?	☐ Yes ☐ No
Do any of the following apply: —you know or suspect the intention behind the gift is to influence someone to act improperly? —the gift seems excessive in the circumstances? —the gift could reasonably be perceived to be corrupt? —the law of the territory and/or the regulations of the recipient do not allow this sort of gift/hospitality?	☐ Yes—contact Head of Legal and Compliance ☐ No ☐ Don't know—contact Head of Legal and Compliance
Are you are aware of any other reason why the gift/hospitality should be rejected?	☐ Yes—provide details ☐ No ☐ Don't know—contact Head of Legal and Compliance
Signature of person receiving or giving gift or hospitality and date form completed.	Signature: Date:
Approval sought from:	

If you have any questions, please contact Head of Legal and Compliance.