

ACG Metals Limited

Training Policy

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.

We accordingly provide compliance training to you as necessary. The training will assist you to understand your and ACG Metal's obligations and what you should be doing to uphold these standards. This training complements our compliance policies, which also provide guidance and instruction on relevant topics, such as on Bribery and Corruption, Charitable Giving, and Gifts and Hospitality.

Scope

This Policy applies to all directors, officers and employees of ACG Metals, wherever located. ACG may also require that any person or company acting on behalf of ACG Metals, whether as an associate, contractor, consultant, agent, or otherwise also complete training where necessary, based on their individual risk assessment.

Policy

All new joiners should complete the following mandatory training:

- Whistleblowing
- Anti-Bribery and Corruption
- Market Abuse Regulation (MAR) compliance

Employees who deal with external contacts and third parties should also complete the following training at the beginning of their employment:

- Gifts and Hospitality
- Due Diligence
- Anti-Money Laundering

Managers may assign various role specific training sessions to their teams and employees in specialised roles. This may include training on dealing with public officials for all employees who have regular interactions with public officials.

ACG Metals understands that the likelihood of coming across certain compliance risks and issues may differ depending on the employee's role and seniority. As such, we will aim to tailor training materials and length to match the level of seniority and/or risk that the employee may be exposed to in their role.

All employees are expected to carry out their mandatory training within [four weeks] of starting their role. Refusal to attend or complete mandatory training sessions may lead to disciplinary action and potential termination of employment/ engagement.

Individuals in high-risk roles will be asked to confirm their continued understanding of and compliance with anti-bribery and corruption policies on an annual basis.

All company policies shall be shared with employees via email or be available on the company's internal website. It is expected that all employees familiarise themselves with the policies.

Record keeping

All training session and attendances will be recorded via a central log.

Monitoring and Reporting

ACG Metals is committed to open communication and encourages requests for guidance if you have questions about the appropriateness of training materials assigned to you or you consider you require training that has not been provided.

We will periodically review our policies and procedures to ensure their effectiveness. Employees are encouraged to report any concerns.

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 as this Policy supports our values and commitment to ethical business practices.

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

Contact Details

If you have any questions about this policy, please contact the Chief Legal Officer.

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