

Compliance report: Responsible Sourcing of Gold & Silver to Harjavalta 2021



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INTRODUCTION TO BOLIDEN HARJAVALTA

Responsible Company	Boliden Commercial AB, with its office located at Klarabergsviadukten 90A, SE-101 35 Stockholm Sweden.
Smelter's name	Boliden Harjavalta Oy in Harjavalta & Pori, Finland
Scope	Gold & silver production at Boliden Harjavalta
Reporting year	1 Jan 2021-31 Dec 2021
Date of Report	2022-03-31
Senior management responsible for this report	Daniel Peltonen, President Boliden Smelters & Boliden Commercial AB

Boliden Harjavalta

Production: gold 7 151 kg & silver 83 440 kg.

Raw materials: Copper concentrates, intermediate copper raw materials, recycled metal, residues.

Other: Smelter located Harjavalta, refinery located in Pori. During 2021, one delivery of copper concentrates originated from a CAHRA has been received at Harjavalta. There were no red flags or alternatively red flags has been cleared, that was associated with the specific supplier of this shipment.

STEP 1: ESTABLISH STRONG COMPANY MANAGEMENT SYSTEMS

Compliance Statement:

Boliden comply with Step 1: to establish strong company management systems.

1.A. Has the refiner adopted a supply chain policy regarding due diligence for supply chains of Gold & silver?

Mineral Supply Chain Policy: Boliden Business Partner Code of Conduct

The risks related to responsible sourcing are captured in the Boliden Business Partner Code of Conduct. The Code has been approved by CEO and published at Boliden external webpage¹.

The Business Partner Code of Conduct specifically addresses human rights, labor rights, environment, anti-corruption, anti-money laundering and conflict minerals. The Code has been developed from the principles laid out in the UN Global Compact, the ILO fundamental conventions, the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (OECD DDG), as well as other international industry standards and best practices.

In the beginning of 2022, the Business Partner Code of Conduct has been updated and approved by the CEO to ensure inclusion of requirements from UN Guiding Principles on Business & Human and to ensure OECD DDG requirements cover all minerals sourced to Boliden's operations.

1.B. Has the refiner set up an internal management structure to support supply chain due diligence?

Boliden Smelter's ESG Program

Roles and responsibilities, internal and external audit requirements, communication plan training schedule, continuous improvements and operational activities to identify and assess risks in the mineral value chain, are captured under the Boliden Smelters ESG Program ("the ESG program"), defined since January 2022 in Boliden's Management System (BMS) and approved by Director for Sustainability, Technology & Strategy (SATS). The ESG program's purpose is to drive Boliden smelters work and continuous improvements with ESG in the Value Chain and secure compliance to Boliden Business Partner Code of Conduct.

¹ <https://www.boliden.com/operations/about-boliden/business-partner-code-of-conduct>

The Manager Responsible Business & Sustainability has been mandated with the responsibility to implement and develop the supply chain due diligence process and ensure an independent line of accountability that is separated from the line organisation. The Manager Responsible Business & Sustainability reports on red flags, on-going risk management plans with high to critical risk business partners, and progress of improvement activities on a quarterly basis to the Boliden Smelters Management team, and annually to the Smelters Business Board. The Smelters business boards holds the ultimate accountability for the mineral supply chain. In order to ensure independency from the commercial organisation, the Manager Responsible Business & Sustainability is working closely to the Group Ethics & Compliance Officer and has a direct link of reporting to Smelters Director for Sustainability, Technology & Strategy ("SATS") who is a member of Boliden Compliance Council. The governance structure is visualized in Figure 1.

Stakeholders and communication

It is essential that the Business Partner Code of Conduct is communicated to relevant counterparties, such as suppliers of raw materials to the smelters. The main point of contact to the suppliers is the commercial organisation who is responsible to ensure that the principles in the Business Partner Code of Conduct is understood by the counterpart. A prerequisite to achieve this, is internal trainings of the commercial staff. Additionally, the Manager Responsible Business & Sustainability holds continuous meetings with the commercial staff about prospective and existing business partners where the policy and process are communicated on a needs basis.

In practice, the Business Partner Code of Conduct is communicated to the counterpart in various ways. If the counterpart has not been introduced to the code from its main Boliden contact, it will be introduced to the code when responding to a self-assessment questionnaire (SAQ). Adverse impacts related to the Business partner Code of Conduct or equivalent standards is always at minimum included in the commercial contract, which includes adverse impacts equal to those listed in the Annex II of the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas.

In the Boliden Annual and Sustainability report and Sustainability index, the policy and supply chain due diligence process are presented².

These communication activities including a system to evaluate the effectiveness of the communication have not yet been formalized in the communication plan but will be completed during 2022.

During audit period:

In 2021, the ESG evaluation of business partner process has been communicated at three occasions to the Smelters staff management team for the purpose of creating knowledge and understanding of the risks. During one of the occasions a strategic plan for the ESG Program until 2025 was

² <https://www.boliden.com/investor-relations/reports-and-presentations/annual-reports>

approved by the management team. The main objective of the strategic plan is to be able to manage ESG risks on any market.

Escalation of high to critical cases

The supply chain due diligence process for responsible sourcing of minerals, internally named the ESG Evaluation of Business Partners, is part of the ESG program umbrella. The ESG Evaluation of Business Partners process is designed to identify, manage and mitigate risks that may jeopardize the standards in the Boliden Business Partner Code of Conduct.

The ESG program was formalized and approved by Smelters management team in 2020. The ESG program adds a more detailed definition of risk and defines the level of authorization for such risks in the organization. The highest level of risk, *critical risk*, is defined as a business partner for which a red flag(s) has been confirmed. A red flag is at minimum, a red flag as defined in the OECD DDG Supplement on Gold but may also be an identified risk of a serious human rights breach or serious environmental harm wider than those listed in the OECD DDG. If any such red flag is identified, the ultimate decision to approve a business partners can only be authorized by Boliden Group Management. An approved critical risk business partner should have a risk management plan, which outlines the adverse risks and mitigating activities. The business relation shall also be subject to continuous dialogue, where the adverse risks and other compliance and ESG matters are discussed and the business partner may present results to any corrective action.

The escalation process follows an internal process to assess and mitigate risks, review risk and suggested measures and finally to approve or reject the counterparty as a business partner. This process is set up to ensure an independent line of accountability, separated from the line organisation. In practice, the initial steps of risk identification are performed by the line organisation. If a risk or a red flag is identified, the case is escalated to the ESG Team. The Manager Responsible Business & Sustainability is qualified in assessing and mitigating risks. Where needed, internal or external expertise is appointed. The escalated case is summarized in a report, which is reviewed a remittance committee. The composition of the remittance committee and the competent members differ depending on the level of risk. For critical risks, the remittance committee consists of CFO, Senior Vice President Corporate Responsibility, General Counsel Legal Affairs, Director Group Sustainability, Chief Ethics and Compliance Officer. The remittance committee may suggest additional mitigating activities. Ultimately, the case is presented to the authorizing body who may approve or reject the counterpart as a business partner.

Specific ESG clauses including a commitment to the OECD DDG has been developed but not yet implemented and added to the current commercial agreements with raw material suppliers. This is planned to be completed during 2022.

In Figure 1, the governance structure, including level of authorization and remittance, for cases subject to the ESG evaluation of business partner process, is visualized.

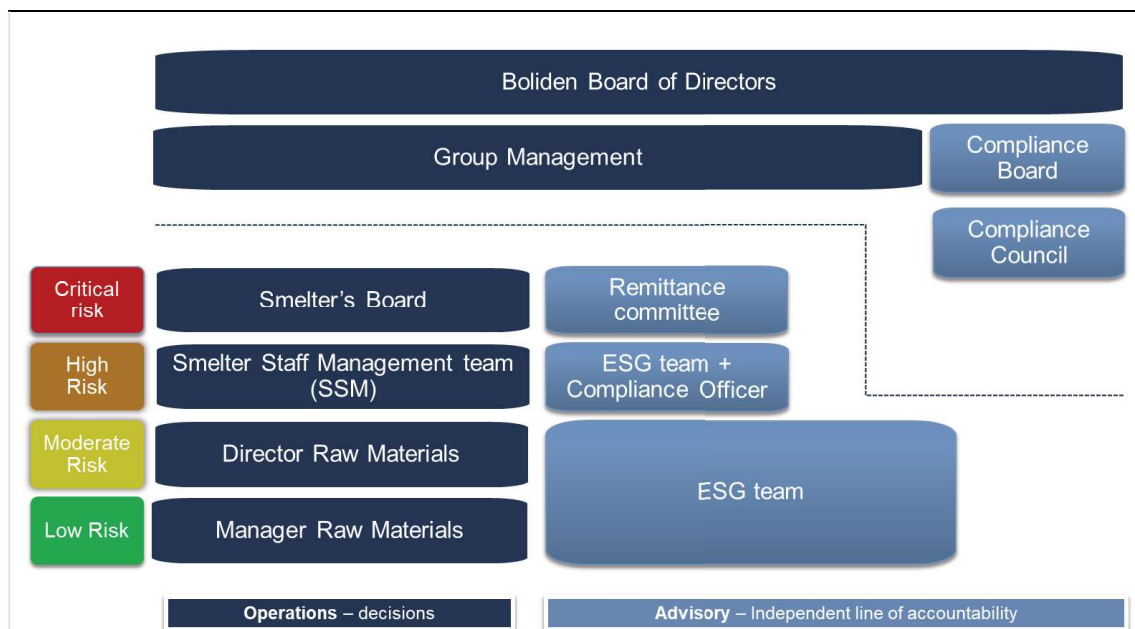


Figure 1. Governance structure of Boliden Smelters ESG program and process.

During the audit period:

No cases related to the sourcing of gold and silver has been escalated. One case that was related to zinc concentrates was escalated to the Manager Responsible Business & Sustainability by the raw material business team. The case was subject for enhanced due diligence screening. With the information from the enhanced screening as the basis, the Chief Ethics & Compliance Officer was consulted, who further involved the legal department. The final recommendation from the remittance team was to not continue contract negotiations and the business partner was put on hold.

1.C. Has the refiner established a strong internal system of due diligence, controls and transparency over gold & silver mineral supply chains, including traceability and identification of other supply chain actors?

Due Diligence Control System

Prior to signing a contract with a counterpart, the counterpart is subject to the ESG evaluation of Business Partner process before it can be approved as a business partner.

The process is managed in an online based tool, named Evaluate, allowing the responsible purchasing manager to schedule and follow up on the assessment of each counterparty, that shall be subject for this evaluation minimum once every 5 years.

The first step of the process is a risk screening phase, which sets out a number of indicators for risk regarding environmental, social and governance aspects. Boliden has a list of countries indicating higher risk for breach of these aspects, the list differs between CAHRAs and high-risk countries. Deliveries from CAHRA's is deemed as a high to critical risk, while deliveries from high-risk countries may indicate a moderate to a high risk depending on the nature of the contract.

The steps included in the first phase of the evaluation is at minimum a compliance screening and a SAQ. The compliance screening is conducted in the Dow Jones Risk & Compliance system, where sanctions and other governance related compliance risks are assessed. In case of uncertainties or if a heightened risk is identified, the case is subject for an escalation before approval can be granted. The process is described in detail with flow sheet and instructions in BMS.

Boliden have a robust 'lot' receipts process and supporting system, named EKA. Each delivery of gold & silver containing material are recorded with information about country of origin and country of loading, raw material quality, weights, assay details and date of arrival. All deliveries of raw material to Boliden's smelters and refineries must register country of origin and the country of loading. This information must be presented on an advise note or a provisional invoice that the counterpart must send to the smelter prior to delivery. The system has been designed with an automatic red flag alert if the country of origin or loading is listed in Boliden Smelter's list of Conflict affected and/or high-risk countries. The system user is prevented from registering the delivery without approval from authorized level. The suppliers are prevented to deliver any material before the delivery is registered in the system.

In Figure 2, Boliden Smelters process to identify and manage risks, aligned to the Business Partner Code of Conduct is visualized. In the top the main standards that shapes the Business Partner Code of Conduct is shown. Connected below the Business Partner Code of Conduct is different indicators addressing risks, ability to manage risk and mitigation of risk. In the bottom, each activity taken place in the process is connected to the indicators. The first activities, risk assessment and compliance screening, aims to identify the level of risk based upon a number of risk indicators. The SAQ has two purposes, one being collecting information about the business partner's ability to manage risks relevant to the geographical location and other external risk factors, the other being a tool to communicate the Business Partner Code of Conduct to the business partners and thus preventing risk. For business partners rated moderate or higher risk, a red flag-checklist is followed. The red-flag checklist shall ensure that no important risk indicators is missed from the previous steps. This is followed by a re-risk assessment, which shall serve as a guide if additional activities are required. One additional activity may be a business partner audit, that shall provide evidence to any gaps found in the previous activities and assess the counterparty's level of implementation of the management system and actual events of breaches to the Business Partner Code of Conduct. The final step of the risk assessment is the start of the risk mitigation, which is initiated with on-boarding activities, such as implementing mitigating contract clauses and acceptance of recommendations for improvement. This is followed by continuous monitoring, to ensure continuous development and actual improvement.



Figure 2. Boliden Smelters ESG process based on Boliden Business Partner Code of Conduct

During the audit period:

All employees except one that is involved in the risk screening phase of the gold & silver supply chain due diligence process has been trained in the ESG Evaluation of Business Partners Process since 1 January 2021.

1.D. Has the refiner strengthened company engagement with gold & silver supplying counterparties, and where possible, assisted gold & silver minerals supplying counterparties in building due diligence capabilities?

Company engagement with Business Partners on ESG

For business partners indicating an increased risk, a formalized dialogue in the expectations from the due diligence process and Boliden Business Partner Code of Conduct is set up during the ESG Evaluation. This process is part of the process to understand the business partner's ability to manage risks, a platform to communicate good practice, and an opportunity to establish the ESG aspects as an essential part of the relation with the business partner. In these dialogues, both commercial staff and relevant subject matter expertise participates. These dialogues are also set up as a risk mitigating activity for ongoing partnerships.

During assessment period:

During 2021, at least three ESG dialogue subject for both evaluation and risk mitigation has been conducted with gold & silver supplying business partners to Boliden Harjavalta.

One example of a new supplier – a trader that has been rated as critical risk was approved by the Smelters board in the end of 2020 had its first deliveries in 2021. During the year, continuous dialogues with the business partners has been conducted regarding ESG requirements, both in e-mail and on-line meetings. The requirements on the supplier are to perform on-site assessments. These have been delayed due to the covid-19 pandemic.

1.E. Has the refiner established a company-wide communication mechanism to promote broad-based employee participation and risk identification to management?

Grievance mechanism: Boliden whistleblower system

Boliden is committed to the highest standards of ethical business conduct. Boliden’s whistleblower system is provided by an external partner, to ensure anonymity and confidentiality. The whistleblower system is available for both internal and external stakeholders on Boliden’s webpage³

Whistleblowing can be used to inform about a concern about serious wrongdoings within the Boliden group regarding accounting, internal accounting controls, auditing matters, bribery and corruption, other banking- and financial crime, or other serious improprieties concerning the company’s or the group’s vital interests or the life or health of individual persons, as for instance serious environmental crimes, major deficiencies as regards the safety at the place of work and very serious forms of discrimination or harassments.

During the audit period

No grievance related to the mineral supply chain has been filed.

STEP 2: RISK IDENTIFICATION AND ASSESSMENT

Compliance statement:

Boliden complies with step 2: risk identification and assessment.

2.A. Does the refiner have a process to identify risks in the supply chain?

Risk identification and assessment

The first phase of the ESG evaluation of business partners aims to identify risk. Risk is identified in a number of different indicators, visualized in Figure 2. These indicators are related to country, compliance, sanctioned entities and persons, politically exposed persons, state owned entities, ownership, adverse media hits and the business partners own management systems.

The risks in the metal’s supply chain are mainly related to deliveries from high-risk countries. The methodology used for assessing a CAHRA for the gold & silver supply chain during the audit period is

³ <https://report.whistleb.com/en/boliden>

based upon a provided list by TDI Sustainability⁴ for members of the International Copper Association (ICA) and the list of CAHRAs provided by the European Union to be valid for the EU Conflict Minerals Legislation.

Depending on the nature and severity of risk, subject matter expertise is commissioned. This expertise could be either internal or external. For environmental issues related to mining activities, internal expertise from the Boliden mines is used. For human rights, governance and compliance issues, Boliden regularly appoints external advise for expert review.

The environmental risks of highest priority are those listed in our Business Partner Code of Conduct. We encourage our mining business partners to have standards in line with the ICMM Mining Principles, mainly related to waste & tailings management, use of resources in particular water, impacts on local communities and biodiversity conservation.

During audit period:

There have been no red flags or any indication, referring to a suspicion of an actual or risk of a serious breach of the Business Partner Code of Conduct that has been lifted for the gold & silver supply chain.

There has been one delivery from a country listed as a CAHRA to Boliden Harjavalta. The shipment has been subject for further due diligence regarded one delivery of copper concentrates to Boliden Harjavalta. There were no red flags or alternatively red flags has been cleared, that was associated with the specific supplier of this shipment.

2.B. Does the refiner assess risks in light of the standards of their due diligence system?

The sources of information used to identify risks are mainly Dow Jones Risk & Compliance, generic web searches and information collected from the supplier with the SAQ.

The responsibility for the trade sanctions compliance program lies on Group Ethics & Compliance with support from Group Legal Affairs. Sanctions controls must be performed before entering into any contractual arrangements with any third party. Sanctions controls are also repeated on a monthly basis in respect of existing counterparties (batch screening), and any changes are monitored by Group Legal Affairs, supported by third party *Norton Rose Fulbright*. In the raw materials department, the sanctions controls are conducted by one designated administrator. Identified concerns are escalated to Smelters ESG team or Group Legal Affairs.

The SAQ covers questions related to the Business Partner Code of Conduct, in order to find risks of breaches. Each SAQ are evaluated with the basis of a SAQ guide, which ensures consistency in the interpretation of the results.

⁴ <https://tdi-sustainability.com/>

Based on the risk assessment and the responses in the SAQ, business partners subject for an escalation are identified. The escalation may include additional desktop assessments, dialogue with the business partner and on-site audits. The purpose of escalation activities is to gather evidence of the business partner's performance to the extent necessary. An on-site audit is not an ordinary visit or contact between the commercial representatives. Results from an escalation are summarized in an ESG Risk Assessment Report.

A formal procedure for on the-ground risk assessments still needs to be formalized. In addition, some of the high-risk suppliers have not yet undergone an enhanced due diligence including conducting on-the ground assessment where applicable.

All steering and guiding documentations concerning the ESG Evaluation of Business Partners are stored and made available internally to relevant personnel in the BMS. Documentation related to each case under evaluation, shall be available in the Evaluate system.

For higher risk cases enhanced compliance screenings on board of director and executives is conducted in both Dow Jones Risk & Compliance and Factiva.

During audit period:

Due to the Covid-19 pandemic, no site visit related to the gold & silver supply chain has been conducted in 2021.

Since 2020, Evaluate has been used to complete the steps in the risk identification, assessment and management. In the third quarter of 2021 the platform was upgraded with a workflow feature containing all the steps in the ESG evaluation of business partner's process. This workflow including the steps related to assessment of risk determination, compliance screenings, SAQs and red-flag checklists has not yet been implemented and completed for all counterparties.

STEP 3: RISK MANAGEMENT

Compliance statement:

Boliden complies with step 3: risk management.

Has the refiner reported supply chain risks to senior management and devised a strategy for risk management of an identified risk by either (i) mitigation of the risk while continuing to trade, (ii) mitigation of the risk while suspending trade or (iii) disengagement from the risk?

Risk management

For all new high to critical risk business partner, a risk management plan must be established. The risk management plan sets out corrective actions and other activities that aims to mitigate risk. As a minimum, the risk management plan must include (i) corrective actions to the most important risks, (ii) regular dialogues with the business partner to follow-up on the most important risks and the business partner performance to manage these risks, and (iii) contract clauses with possibility to eliminate materials in a contract in case of a serious OECD Annex II breach.

Target for 2022 is that at least 80 % of all high-critical risk suppliers shall have a risk management plan in place. In 2021 this requirement has only been implemented for critical risk business partner.

In 2021 a risk management plan is established for five suppliers, of which three are delivering gold & silver containing raw material to Boliden.

For none of the gold & silver containing raw material suppliers' material risks or breaches of the Business Partner Code of Conduct has been identified.

Cases of enhanced risk assessment and risk management during audit period:

One business partner delivering copper and precious metals concentrates from various locations to both copper smelters, Boliden Harjavalta and Boliden Rönnskär has been subject for an escalation. For each delivery from a mine located in a high-risk country the supplier has agreed to deliver specific due diligence reports and for some cases also complete on-site assessments using independent assessors, despite these specific origins of concentrate has been deemed low to moderate risk by the suppliers own due diligence management system. Due to the covid-19 pandemic, these on-site assessments have been delayed. The obligations are part of the risk management plan that has been established with the business partner. The Smelters board approved deliveries from the business partner at the end of 2020.

STEP 4: INDEPENDENT THIRD-PARTY AUDIT AT IDENTIFIED POINTS

Compliance statement:

Boliden complies with step 4: independent third-party audit.

Boliden's smelter and refinery capacities at Harjavalta and Pori are identified points for the customers of the products from respective smelter. Josué Ruiz from RCS Global has independently reviewed this identified point in accordance with the LBMA Responsible Gold Guidance v8 and Responsible Silver Guidance v1. Josué Ruiz at RCS Global is an approved Copper Mark lead assessor and has worked in the field of CSR, sustainability and supply chain due diligence since 2007. He has certificates and approvals from SA8000, RBA (Labour and Ethics), RMI (3TG+Cobalt), LBMA, LPPM, SEDEX, BSCI, RJC, PSCI and ISO14001:2015. The reasonable assurance report based on the ISAE 3000 standard is found attached to this Compliance Report.

The audit has taken place on-site at Boliden Harjavalta on the 20th of January 2022 and remotely with Boliden Commercial staff located in Stockholm, Sweden on the 8th of February 2022.

STEP 5: REPORT ON SUPPLY CHAIN DUE DILIGENCE


Further information and specific details of how Boliden's systems, procedures, processes and controls have been implemented to align to the specific requirements in the *OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas*, has been set out our ESG Evaluation of Business Partners process.

<http://www.boliden.com/Investor-Relations/Reports-and-Presentations/Annual-reports/>

Management conclusion statement on compliance with this guide:

In conclusion, Boliden implemented effective management systems, procedures, processes and practices to conform to the requirements of the *OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas* for the supply of gold & silver, for the audit period 1 January 2021-31 December 2021.

Boliden is committed to continuous improvement, and any corrective actions identified will be monitored internally on a regular basis. The ESG Program and related policies and processes will be further developed together with internal and external expertise on the ESG issues.

Signature: 
Daniel Peltonen (Apr 8, 2022 05:22 EDT)

Daniel Peltonen

President BA Smelters



INDEPENDENT REASONABLE ASSURANCE REPORT

LBMA Responsible Gold and Silver Sourcing Audit

Boliden AB (Harjavalta Operations)

20 January 2022

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REPORT SUMMARY

Implementing firm	RCS Global Group Address: 9a Burroughs Gardens, London, NW4 4AU, U.K contact@rcsglobal.com CONTACT PERSON: Josephine Quioc, Project Manager CONTACT TELEPHONE: +49 173 233 83 68
Type of assessment	LBMA ISAE 3000 Reasonable Assurance Assessment
Refiner	Boliden AB (Harjavalta Operations)
Assessed Timeframe	1 January 2021 – 31 December 2021

1. INTRODUCTION

We were engaged by Boliden AB (Harjavalta Operations) or the “Refiner” to provide reasonable assurance on its Refiner’s Compliance Report for the year ended 31 December 2021.

The assurance scope consists of the Refiner’s Compliance Report.

2. RESPONSIBILITIES

The Compliance Officer of the Refiner is responsible for the preparation of the Refiner’s Compliance Report in accordance with the *LBMA Responsible Gold and Silver Guidance* (the “*Guidance*”). This responsibility includes establishing appropriate risk management and internal controls from which the reported information is derived. The criteria identified by the Refiner as relevant for demonstrating compliance with the *Guidance* are the activities described within the Refiner’s Compliance Report.

Our responsibility is to carry out a reasonable assurance engagement in order to express a conclusion based on the Refiner’s activities described within the Refiner’s Compliance Report. Within the scope of our engagement, we did not perform an audit on external sources of information or expert opinions, referred to in the Refiner’s Compliance Report. Our assignment is limited to the historical information that is presented and does not cover future-oriented information.

The procedures performed depend on our judgment as auditor, including the assessment of the risks of material misstatement in the Refiner’s Compliance Report, whether due to fraud or error. In making those risk assessments, we consider internal control relevant to the preparation of the Refiner’s Compliance Report in order to design procedures that are appropriate in the circumstances, but not for the purpose of expressing an opinion on the effectiveness of the internal control of the Refiner.

We conducted our assurance engagement in accordance with International Standard on Assurance Engagements *ISAE 3000 Assurance Engagements other than Audits or Reviews of Historical Financial Information* issued by the International Auditing and Assurance Standards Board and the guidance set out in the *LBMA Responsible Sourcing Programme – LBMA Third Party Audit Guidance* (the “*Audit Guidance*”).

This report has been prepared for the Refiner for the purpose of assisting the Compliance Officer in determining whether the Refiner’s Compliance Report has complied with the *Audit Guidance* and for no other purpose. Our assurance report is made solely to the Refiner in accordance with the terms of our engagement. We do not accept or assume responsibility to anyone other than the Refiner for our work, or for the conclusions we have reached in the assurance report.

3. INHERENT LIMITATIONS

Non-financial information, such as that included in the Refiner’s Compliance Report, is subject to more inherent limitations than financial information, given the more qualitative characteristics of the subject matter and the methods used for determining such information. The methods used by Refiners to comply with the *Guidance* may differ. It is important to read the Refiner’s gold and silver supply chain policy available on their website [<https://www.boliden.com/operations/about-boliden/business-partner-code-of-conduct>]. Such information and methods do not fall within the scope of the *Audit Guidance* and we have not undertaken any assessment in this regard.


4. INDEPENDENCE AND COMPETENCY STATEMENT

In conducting our engagement, we have complied with the applicable requirements of the Code of Ethics for Professional Accountants issued by the International Ethics Standards Board for Accountants.

In conducting our engagement, we confirm that we satisfy the criteria for assurance providers as set out in out in the *Audit Guidance* to carry out the assurance engagement.

5. CONCLUSION

In our opinion, the Refiner's Compliance Report for the year ended 31 December 2021, in all material respects, describes fairly the activities undertaken during the year to demonstrate compliance, and management's overall conclusion contained therein, is in accordance with the requirements of the *LBMA Responsible Gold and Silver Guidance*.

Signature	
Assurance Firm	RCS Global
Date	15 February 2021
City, Country	Berlin, Germany



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