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Anti-Money Laundering and Counter-Terrorist Financing Statement

Tharisa plc and Subsidiaries

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ANTI-MONEY LAUNDERING AND COUNTER-TERRORIST FINANCING STATEMENT

THARISA PLC

(Incorporated in the Republic of Cyprus with registration number HE223412)

JSE share code: THA | LSE share code: THS

Document Control

Item	Detail
Statement Custodian	Company Secretary
Approved by	Board of Directors of Tharisa plc
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1. PURPOSE

Tharisa plc (the 'Company' and, together with its subsidiaries, the 'Group') is committed to conducting its business responsibly, ethically and in compliance with applicable anti-money laundering and counter-terrorist financing laws. This Anti-Money Laundering and Counter-Terrorist Financing Statement (the 'Statement') sets out the Group's commitment to preventing its operations, funds, assets and business relationships from being used for money laundering, terrorist financing or other illicit financial activity.

The Board of Directors (the 'Board') recognises that effective management of financial crime risks is fundamental to good corporate governance, responsible corporate citizenship and the protection of the Group's reputation, stakeholders and social licence to operate. This Statement supports the Group's broader commitment to ethical leadership, integrity and sustainable value creation.

2. SCOPE

This Statement applies to Tharisa plc and all entities within the Group, and to the following persons in the conduct of Group business:

- All directors, executives and the Company Secretary
- All employees, whether permanent, fixed term or temporary
- Third Party Representatives, being contractors, consultants, advisers, agents, intermediaries, business partners and other persons who act for or on behalf of a Group company and
- Suppliers of goods or services that do not act on the Group’s behalf, which are not Third Party Representatives but remain subject to the due diligence, screening and contractual requirements of the Policy on a risk-based basis, and whose standards are expected to be consistent with this Statement

3. GUIDING FRAMEWORK

The Group's approach to anti-money laundering and counter-terrorist financing is informed by applicable law and recognised international standards, including relevant anti-money laundering and proceeds-of-crime legislation in the jurisdictions in which the Group operates and the recommendations of the Financial Action Task Force, as reflected in applicable law. Where applicable requirements differ, the Group applies the most stringent applicable standard.

4. ANTI-MONEY LAUNDERING AND COUNTER-TERRORIST FINANCING COMMITMENT

The Group adopts a zero tolerance approach to money laundering, terrorist financing and the facilitation of unlawful financial activity. In giving effect to this commitment, the Group shall:

- Conduct business with integrity, transparency and accountability
- Comply with applicable anti-money laundering and counter-terrorist financing laws and regulations
- Implement reasonable and proportionate measures to identify, assess and manage financial crime risks
- Apply risk-based due diligence to counterparties and business relationships
- Maintain appropriate controls over transactions, payments and business activities
- Undertake sanctions screening and related integrity assessments in accordance with the Group's sanctions screening framework
- Report suspicious transactions and matters to the relevant authority where required by law and
- Promote a culture in which concerns may be raised in good faith and without fear of retaliation

5. RISK MANAGEMENT AND DUE DILIGENCE

The Group applies a risk-based approach to anti-money laundering and counter-terrorist financing compliance, proportionate to the nature, scale and complexity of its activities. Although the Company is a mining holding company and not a financial institution or designated accountable institution, the Board recognises that the Group's international operations, commodity marketing activities, cross-border transactions and commercial relationships may give rise to financial crime risks. The Group therefore undertakes ongoing due diligence and risk assessment activities designed to:

- Identify and assess financial crime risks associated with counterparties, transactions and business relationships
- Verify the identity and, where appropriate, the beneficial ownership of counterparties
- Establish the source of funds and, where relevant, the source of wealth, if applicable
- Assess ownership and control structures and other integrity-related risk indicators
- Undertake sanctions, politically exposed person and adverse media screening
- Integrate financial crime risk considerations into governance, risk management and business decision-making processes
- Monitor the effectiveness of controls and mitigating measures and
- Maintain appropriate records, investigations and reporting processes

This Statement should be read together with the Group's Anti-Bribery, Anti-Corruption, Anti-Money Laundering, Sanctions and Counter-Terrorist Financing Policy and the Sanctions Screening Framework, which contain the Group's detailed requirements, procedures and controls.

6. SUPPLIERS AND BUSINESS PARTNERS

The Group expects suppliers, contractors, financiers, customers, agents and business partners to conduct their affairs lawfully and ethically and to maintain standards consistent with this Statement. Where appropriate, the Group undertakes risk-based due diligence before entering into or continuing business relationships and may take corrective action, including review or termination of a commercial relationship, where financial crime risks are identified or acceptable standards are not maintained.

7. GOVERNANCE AND ACCOUNTABILITY

The Board

- Approves this Statement and sets the tone from the top in respect of anti-money laundering and counter-terrorist financing
- Oversees implementation through the Social and Ethics Committee, supported by the Audit Committee and Risk Committee

Management

- Is accountable for implementing this Statement across the Group, with the Chief Finance Officer, supported by the Company Secretary and the legal compliance function, overseeing the design and operation of the Group's anti-money laundering and counter-terrorist financing controls
- Embeds financial crime risk considerations into operations, governance and business decision-making and
- Reports material matters to the Board through the appropriate governance structures

8. REPORTING CONCERNS AND REMEDY

Any person who becomes aware of an actual, attempted or potential instance of money laundering, terrorist financing or other illicit financial activity connected to the Group's operations should report it promptly through any of the following channels:

- Their line manager or Head of Department
- The Chief Finance Officer
- The Company Secretary
- The Group General Counsel
- The Head of Internal Audit
- The chairman of the Social and Ethics Committee or the Audit Committee or
- The Group's confidential and anonymous Whistleblowing Hotline

Persons who raise concerns in good faith are protected from retaliation in accordance with the Whistleblowing Policy.

9. MONITORING, REPORTING AND REVIEW

The Group periodically reviews its anti-money laundering and counter-terrorist financing controls and reports on relevant governance, ethics and compliance matters through its Integrated Annual Report, Sustainability Report and other disclosures, where appropriate.

This Statement is reviewed at least every two years by the Company Secretary, in consultation with the Social and Ethics Committee, and is submitted to the Board for approval when material revisions are required, or earlier if warranted by material changes in the Group's operations, risks or the applicable legal framework.

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10. RELATED DOCUMENTS

This Statement should be read in conjunction with the following:

- Anti-Bribery, Anti-Corruption, Anti-Money Laundering, Sanctions and Counter-Terrorist Financing Policy
- Sanctions Screening Framework
- Code of Business Ethics and Conduct
- Group Governance Framework
- Responsible Procurement and Sourcing Policy and
- Whistleblowing Policy

11. APPROVAL

This Statement was approved by the Board on 20 October 2026.