

POLICY

Harmony Gold Mining Company Limited ("Harmony")

ANTI-MONEY LAUNDERING POLICY AML001

DOCUMENT USERS	:	ALL HARMONY DIRECTORS AND EMPLOYEES
PERSON RESPONSIBLE FOR KEEPING DOCUMENT CURRENT	:	GROUP COMPANY SECRETARY

Revision	Prepared	Reviewed	Approved	Date	Description
V0.0	Ethics Department	Ethics Management Committee	Audit and Risk Committee	10 November 2023	Finalised for use
V0.1	Management Ethics Department	Group Executive Committee Social and Ethics Committee	Audit and Risk Committee	10 November 2025	Finalised for use

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1. INTRODUCTION & BACKGROUND

- 1.1. This Anti-money Laundering Policy ("**AML Policy**") is paramount to the good governance of Harmony Gold Mining Company Ltd ("**Harmony**"). To achieve the intended outcomes of the AML Policy, Harmony has integrated the following key elements, namely having the right quality individuals in the Board and management, implementing strong processes and controls and having a robust independent oversight and assurance over all processes and controls.
- 1.2. This AML Policy is applicable to the following categories of persons, natural and juristic, associated with Harmony (referenced as "applicable persons" throughout this document):
 - All executive and non-executive directors of Harmony;
 - All managers employed by Harmony;
 - Permanent, temporary, contractors, home-based and/or casual employees of Harmony;
 - Authorised agents acting on behalf of Harmony;
 - Authorised third-parties and consultants acting/undertaking work on behalf of Harmony;
 - Individuals seconded by external parties to Harmony;
 - Any authorised volunteers and interns;
 - All service providers and vendors; and
 - All business partners and authorised associates of Harmony.
- 1.3. As all the aforementioned categories of persons, irrespective of which country or jurisdiction they live or work, must comply with this AML Policy, Harmony will undertake reasonable measures to inform applicable persons of the AML Policy and its contents.
- 1.4. The AML Policy is designed to minimise the risk of inadvertent involvement in money laundering and terrorism financing by Harmony and sets out the mandatory requirements to be implemented so as to ensure compliance with global anti-money laundering / counter-terror financing ("**CTF**") laws and best practice.
- 1.5. All applicable persons are required to be conversant with the content of the AML Policy and with the provisions of the relevant AML / CTF legislation.

- 1.6. Although Harmony is not designated as an accountable or reporting institution in terms of Schedules 1 and 3 of the South African Financial Intelligence Centre Act, 2001 (“FICA”):
- 1.6.1. Golding mining companies have been identified by the global Financial Action Task Force (“**FATF**”) as being entities that are vulnerable to abuse by criminals for terrorism financing and money laundering purposes.
 - 1.6.2. Harmony has operations in South Africa and Papua New Guinea¹ which are deemed high risk jurisdictions for Money laundering and bribery and corruption.
 - 1.6.3. Recent shifts in the global economy have resulted in an increased demand for stable-value investments and commodities. Gold is a universally accepted currency that has remained stable in spite of fluctuations in global financial markets. Internationally enforced AML measures are influencing a shift in criminal behaviours towards methodologies with lower law enforcement visibility, which makes gold an ideal vehicle for money laundering.
 - 1.6.4. The trade in precious metals and stones has been linked to illicit financial flows, corruption, smuggling, drug trafficking, illicit arms trafficking, and the financing of terrorism. In addition, the extraction of precious minerals and the subsequent trade in these resources, if properly managed, present significant revenue opportunities, particularly for countries facing development needs.
 - 1.6.5. Harmony, as a South African listed company, with a dual listing in the United States of America, has various compliance obligations in relation to targeted financial sanctions in terms of Financial Intelligence Centre Act (“**FICA**”), combating terrorism financing in terms of the Protection of Constitutional Democracy against Terrorist and Related Activities Act No.33 of 2004 (“**POCDATARA**”) and the United States Anti-Money Laundering Act.

¹ Despite Papua New Guinea’s recent removal from the Financial Action Task Force (FATF) Gray List, it is still considered a high risk jurisdiction.

- 1.6.6. FATF Recommendation 28 requires that dealers in precious metals/dealers in precious stones be subject to effective systems for monitoring and ensuring compliance with AML/CTF requirements.
- 1.6.7. Where Harmony or any Australian subsidiary of Harmony provides a “designated service” under the Anti-Money Laundering and Counter-Terrorism Financing Act 2006 - including buying or selling bullion it will be a be regarded as a “reporting entity” for purposes of the act and will be subject to additional AML obligations.
- 1.6.8. Similarly, where Harmony or any Papua New Guinean subsidiary of Harmony provides a regulated service or otherwise falls within the scope of the Papua New Guinean Anti-Money Laundering and Counter Terrorist Financing Act 2015, it will be subject to additional AML obligations.
- 1.7. Harmony is committed to operating on an ethical and sound basis and in-line with applicable legislation and is committed to complying fully with AML and CTF laws and global best practice.
- 1.8. The Board and management of Harmony will actively and visibly lead the Harmony’s AML Policy and ensure that it is implemented consistently and with clear lines of authority. Harmony is committed to continually improving its AML controls.
- 1.9. Accordingly, Harmony has created this policy in order to ensure adherence to good corporate governance principles, and to combat the terrorism financing and money laundering risks which it may face.

2. DEFINITIONS

- 2.1. Money Laundering is the process used by criminals to hide, conceal or disguise the nature, source, location, disposition or movement of the proceeds of unlawful activities or any interest which anyone has in such proceeds.
- 2.2. Terror Financing is the collection or provision of funds for the purpose of enhancing the ability of an entity or anyone who is involved in terrorism or related activities to commit an act that is regarded as a terrorist act. Funds may be raised from legitimate sources, such as personal donations and profits from businesses and charitable organizations, as well as from criminal sources, such as the drug trade, the smuggling of weapons and other goods, fraud, kidnapping and extortion.

3. SCOPE

- 3.1. This policy applies to all persons referred to in paragraph 1.2 above, wherever located. All such persons must read, become familiar and comply with this policy. Where vendors are juristic entities, the vendors must ensure that its employees and agents that engage in activities for and on behalf of Harmony are familiar with this policy.

4. NON-COMPLIANCE WITH THE POLICY

- 4.1. Any breach of this policy will be regarded as a serious matter, which may result in, amongst others:
- 4.1.1. Disciplinary action being taken against employees, which could result in dismissal and criminal proceedings;
 - 4.1.2. The termination of contracts for vendors and criminal proceedings;
 - 4.1.3. The termination of ongoing support for a beneficiary, criminal proceedings and steps to recover any support already provided;
 - 4.1.4. The termination of any further relationship with third party service providers and criminal proceedings; and
 - 4.1.5. The termination of any further relationship with customers and criminal proceedings.

5. DESIGNATION OF EMPLOYEE RESPONSIBLE FOR ANTI-MONEY LAUNDERING CONTROLS

- 5.1. Harmony will designate a suitable compliance employee to assume responsibility of anti-money laundering controls. That person shall be responsible for developing AML policies and procedures, staff training and applying suitable controls which align with best practice and ensure compliance with applicable AML laws.

6. DUE DILIGENCE

- 6.1. Harmony recognises the risk of terrorism financing and money laundering when dealing clients, agent and business partners.
- 6.2. As a result, Harmony will obtain and review client, agent, business partner, vendors and other third parties' information in order to determine and assess any AML or terror

financing risks. In addition to the above, Harmony will perform robust due diligence enquiries on clients, agents, business partners, vendors and other third parties prior to engaging with such persons/entities.

7. PEP STATUS

- 7.1. Harmony will endeavour to identify whether clients, agents, business partners, vendors and other third parties are linked to politically-exposed persons (“**PEP**”) and therefore at a higher risk of being involved in money laundering.
- 7.2. Clients, agents, business partners, vendors and other third parties that are found to be PEPs, or linked to PEPs will be subject to enhanced due diligence measures and transaction monitoring.

8. SANCTIONS SCREENING

- 8.1. Various AML and sanction laws provide for prohibitions relating to persons and entities identified by the United Nations Security Council resolutions (“UNSC resolutions”), the United States Office of Foreign Assets Control (“**OFAC**”), the Australian Department of Foreign Affairs and Trade (“**DFAT**”) Consolidated List, and any other applicable sanctions lists.
- 8.2. These prohibitions typically apply to all persons, including Harmony as a result of their United States listing and global operations.
- 8.3. Harmony is prohibited from engaging with persons or entities listed on the OFAC Specially Designated Nationals and Blocked Persons List (“**SDN List**”) or any UNSC resolutions.
- 8.4. Harmony’s Group Security and Forensic Investigation Manager (“**Security Manager**”) shall be responsible for internally developing and monitoring the SDN List and UNSC resolutions to ensure Harmony’s compliance with global sanction best practice and best practice. The Security Manager should ensure that Harmony does not engage with any sanctioned persons or entities.
- 8.5. Harmony shall not knowingly do or allow:
 - 8.5.1. The facilitation of money laundering or terror financing or sanctioned activities.

- 8.5.2. Establish or continue business relationships or conclude a single transaction with high-risk entities, such as sanctioned entities, persons or countries.
- 8.5.3. Establish or continue business relationships or conclude a single transaction with entities, persons or countries that would expose Harmony to reputational, operational or legal risks.
- 8.5.4. Engagement with entities, persons who insist on anonymity or whose ultimate ownership is not known.

9. RECORDKEEPING

- 9.1. Harmony, in accordance with AML legislation and global best practice, shall maintain financial records and appropriate internal controls that evidence the business reason for making payments to third parties. In this regard, all books and records will be prepared and maintained with strict accuracy and completeness. No transactions will be accounted for off-record to facilitate or conceal improper payments.
- 9.2. When invoices are received by Harmony, the descriptions of services rendered and/or disbursements must be properly interrogated and vague or suspicious descriptions (for example “special services”, “special bonus” and “administrative expense”) should be properly interrogated by the responsible person before submitting the account for payment. A failure to do so on the part of any employee may result in disciplinary action being taken against such employee.

10. WHISTLEBLOWING AND REPORTING

- 10.1. Harmony encourages all relevant parties to raise good faith concerns regarding any suspicion of/incidences of the unethical prohibited conduct highlighted in this policy document. Additionally, should any applicable persons identify/witness any suspected money laundering, bribery or corruption, they are encouraged to report this to Harmony in terms of the Whistleblowing policy.
- 10.2. Should Harmony become aware or suspect that they are being abused for terrorism financing and/or money laundering purposes are encouraged to notify the South Africa Financial Intelligence Centre (“FIC”).

10.3. Applicable Persons are referred to the Harmony Honesty Hotline, which can be accessed on:

- South Africa: +27 (0) 800 204 256
- Papua New Guinea: +675 (0) 00 478 5280
- Australia: +61 (1) 800 940 949.

11. REVIEW

11.1. Harmony will, at regular intervals, assess compliance with this Policy and will notably include the results of such assessments in reports to the Audit and Risk Committee.

11.2. This Policy may be updated to reflect evolving norms and practices, changes to Harmony policies or procedures or as and when Harmony deems necessary and appropriate to affirm its commitment against money laundering and terrorism financing.

11.3. This document should be read in conjunction with, amongst others, the following Harmony policies:

11.3.1. Anti-Bribery and Corruption Policy;

11.3.2. Code of Conduct;

11.3.3. Whistleblowing policy

12. APPROVAL

This policy/procedure is approved in accordance with the Board Delegation of Authority, Management Delegation of Authority and the Policy of Policies on 10 November 2025 by the Audit and Risk Committee.

Chief Executive Officer

Harmony Gold Mining Company Limited
(On behalf of the Audit and Risk Committee)