

JSC “Almalyk Mining and Metallurgical Complex” – Supply chain policy

General provisions

1. JSC Almalyk Mining and Metallurgical Complex's (“AMMC”) is committed to conducting business responsibly and ensuring that our mineral supply chains uphold the highest standards of ethics, sustainability, and human rights. This Supply Chain Due Diligence Policy (the “Policy”) outlines our approach to identifying, assessing, and addressing risks of adverse impacts in our supply chains in alignment with the OECD Guidance Annex I, the LBMA Responsible Precious metals Guidance including Responsible gold and silver guidances (the “RGG”), the Copper Mark the Risk Readiness Assessment Criteria Guide (the “RRA”) and the Joint Due Diligence Standard (the “JDDS”).

2. AMMC is committed to implementing the five-step due diligence process as defined in Annex I of the OECD Guidance.

These steps include:

1. establishing strong company management systems;
2. identifying and assessing risks in the supply chain;
3. designing and implementing a strategy to respond to identified risks;
4. conducting independent third-party audits of supply chain due diligence at identified points in the supply chain and
5. reporting on supply chain due diligence.

3. AMMC pledge to identify, assess, and respond to risks of adverse impacts and actual adverse impacts within AMMC's mineral supply chains. At a minimum, AMMC's approach includes addressing the Annex II risks as outlined in the OECD Guidance, such as:

- serious abuses associated with the extraction, transport, or trade of minerals (e.g., forced labor, child labor, torture);
- direct or indirect support to non-state armed groups;
- public or private security forces acting in violation of international law;
- bribery and fraudulent misrepresentation of the origin of minerals;
- money laundering linked to mineral trade and
- contribution to conflict through the extraction and trade of minerals.

Before entering into a business relationship, AMMC identifies risks in the supply chain and terminates operations with counterparties that pose such risks.

4. AMMC requires suppliers involved in the supply chain to adhere to this Policy or carry out due diligence on their supply chains in order to identify, assess and mitigate the risks contained in Annex II of the OECD Guidance at a minimum. This requirement applies to all upstream tiers of suppliers, from the origin of the mined metal to supply to AMMC. If risks are identified, AMCC intends to work collaboratively with its suppliers and, where appropriate, other stakeholders, to manage such risks.

5. AMMC makes and receives payments for metals through official banking channels.

6. For the purposes of this policy, we use the following lists to determine conflict-affected and high-risk areas:

- Sanctions lists (US, UK, EU, UN);
- Dodd Frank s. 1502;
- EU CAHRA list and
- Heidelberg Barometer.

The areas included in these lists are considered as CAHRAs.

7. AMMC supports the principles of the Extractive Industry Transparency Initiative (EITI) and, in EITI-implementing countries, is committed to implementing the criteria of the EITI. This includes fostering transparency and accountability in our mineral supply chains and contributing to sustainable development.

8. The Executive Board ("The Board") has ultimate responsibility for approving, overseeing, the Policy. The Procurement Department is responsible for conducting supply chain due diligence, risk management, and reporting. The Compliance Officer is appointed for leading this process.

9. AMMC has established a clear and coherent management process to address risks of adverse impacts and actual adverse impacts. This includes:

- assigning responsibilities to dedicated personnel or teams to oversee due diligence efforts;
- integrating risk assessment findings into our decision-making processes;
- developing and implementing action plans to mitigate risks and remediate adverse impacts where they occur;
- monitoring and evaluating the effectiveness of our actions and revising strategies as needed;
- collaborating with suppliers and stakeholders to promote responsible sourcing practices and
- conducting regular audits, including third-party assessments, to evaluate the effectiveness of the due diligence process.

10. AMMC is committed to continuous improvement by developing feedback mechanisms that allow stakeholders to report concerns related to the supply chain. Regular reviews and updates to the Policy ensure alignment with evolving industry standards and regulations.

11. The policy will be reviewed in case of changes in industry standards, regulations, and changes in the nature of suppliers and types of mined metals to ensure its effectiveness. The Board annually assesses the necessity for such review. Updated information will be shared with all stakeholders.

12. AMMC has the following e-mail address: responsible_supplychain@agmk.uz, enables parties across the supply chain to report any risk, complaints or other grievances, in a confidential, or if chosen, anonymous manner without fear of retaliation, punishment or discipline.

13. This policy is effective as of 1 January 2025 and applies to all current and prospective suppliers within AMMC supply chains.

Approved by Chairman of the Board – Mr. Khursanov A. Kh.

Date 30.12.2024

CURRICULUM VITAE
Komil Sunnatovich Badalov



from September 24, 2021:

**Acting Head of Sales and Procurement of Metallurgical Raw Materials
Department
of Joint-Stock Company «Almalyk Mining and Metallurgical Complex»
Responsible Gold and Silver Compliance Officer**

Date of birth:
29.10.1986

Place of birth:
Bekabad city, Tashkent region

Nationality:
Uzbek

Graduated:
Tashkent State Technical University (2007)

Education:
High

Graduate School of Business (2014)

Language skills: English

Specialization: Marketing

EMPLOYMENT HISTORY

- | | |
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| 2003-2007 - | Student of Tashkent State Technical University |
| 2007-2019 - | Maintenance mechanic of the section of the first rolling mill workshop, Engineer of the commercial department, Export engineer of the product promotion department for foreign markets, Head of the department for market conditions analysis and prospective demand, Head of the foreign economic relations department of JSC "Uzmetkombinat" |
| 2019-2021 - | Leading Specialist of the Procurement and Control Directorate at Enter Engineering Pte. Ltd in the Republic of Uzbekistan |
| 2021- present
- | Acting Head of Sales and Procurement of Metallurgical Raw Materials Department of JSC «Almalyk MMC», Responsible Gold and Silver Compliance Officer |