

Precious Metals Supply Chain Policy

1 Foreword

As one of LBMA accredited refiner, Joint-Stock Company "Almalyk Mining and Metallurgical Complex" (AMMC) conducts all its business to the highest ethical, moral and social responsibility standards. Integrity, honesty and transparency are the foundation of our business.

2 Scope

The Supply Chain Policy applies to all precious metals handled by AMMC and to all of its business partners engaged in refining and trading precious metals. The Scope of management is gold and silver (Precious metals).

It does not apply to general procurement (e.g. office furniture, food, energy, etc.) or other transactions outside the precious mineral supply chain. For a number of years, a philosophy of risk assessment, evaluation, risk monitoring and control has been at the core of our business culture. All material and potential risks are monitored and mitigated.

We are aware of the risks of inadvertent in or contribution to illegal practices that may be associated with the extraction, processing, and exporting of precious metals from any area but more specifically, from conflict-affected and high-risk areas.

Our definition of high risk is aligned with the LBMA Responsible Gold/Silver Guidance and Annex II of the 'OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas' (OECD DDG).

AMMC's Policy is designed and implemented to ensure that our engagements and operations are in accordance with the OECD Due Diligence Guidelines (DDG) and the 'LBMA Responsible Gold/Silver Guidance'.

3 Our Commitment

The designated Compliance Officer responsible and accountable for:

- overseeing the supply chain due diligence process implemented by the affected business line(s) and related employees;
- reviewing the supply chain due diligence process and assessing if the due diligence conducted is adequate, requesting additional documentation or information as necessary;
- ensuring appropriate measures are executed in cases of high-risk supply chains or transactions;
- ensuring that training is delivered to affected business line(s) and related employees;
- ensuring the availability of resources necessary to support the operation and monitoring of said process;
- providing periodic briefings to both the senior management team and the Board of Directors;
- updating this guidance as required;

- provide all necessary information to the Supervisory Board members for monitoring and overseeing the results of compliance of AMMC with the applicable guidance and standards.

All our commitments are achieved by the application, maintenance and continuous improvement of AMMC's management systems, processes, and procedures.

AMMC requires all staff and counterparties involved in the precious metals supply chain to comply with this policy and to strictly implement it.

To keep all counterparties and all relevant employees up to date on requirements and practices, an on-going training program is conducted on a regular basis.

4 Risk assessment on Precious metals

We deem the Precious metals involving the following risks to be high-risk ("Criteria for high-risk"):

- systematic or widespread human rights abuses associated with the extraction, transport or trade of Precious metals;
- direct or indirect support to illegitimate non-state armed groups, or public or private security forces;
- bribery and fraudulent misrepresentation of the origin of Precious metals;
- non-compliance with taxes, fees and royalties due to governments related to mineral extraction, trade and export from Conflict-Affected and High-Risk Areas (CAHRAs);
- money laundering or terrorism financing;
- contribution to conflict; or
- inadequate response to Environmental, Social, and Governance (ESG) risk.

Before entering into a business relationship, the Responsible Departments must determine the risks associated with the Counterparty and its country. If any of the risks stated above exist, then that Counterparty must be identified as a High Risk Counterparty.

Additional analysis may include:

- The risks associated with the country of the counterparty include:
 - mined or processed precious metals originate from or has been moved through the Conflict Regions;
 - the country of origin of mined or processed precious metals are a country that has limited reserves or low levels of precious metals production;
 - the country of origin of mined or processed precious metals are a state known for or reasonably suspected to be transiting gold/silver-bearing material mined in the Conflict Regions.
- The risks associated with the counterparty include:
 - the counterparty or its affiliates are located in the Conflict Regions;
 - the counterparty, its affiliates and companies, or beneficial owners are political persons;
 - the counterparty or its affiliates are active in high-risk businesses such as arms dealing, casinos and gambling, antiques and art, diamond trading, various sects.

5 Due diligence on Precious metals

We conduct due diligence through risk assessment of the Precious metals.

In cases where it becomes clear, as a result of the risk assessment, that the Precious metals meet the Criteria for high-risk, we do not conduct business with those Precious metals.

We analyse all significant Artisanal Small-Scale Miner ("ASM") suppliers and acquire the Precious metals from ASM, provided that ASM activities are legitimate (per the definition given in the OECD FAQs) and that risks are identified and managed accordingly. We will not consider ASM mining activities as legitimate when they contribute to conflict and serious abuses associated with the extraction, transport or trade of minerals as defined in Annex II of the Due Diligence Guidance. We will work with artisanal miners or ASM entities which show genuine commitment to cooperate and engage in a credible process of legalisation.

Responsible departments must monitor the Gold/Silver Supply Chain for each transaction during the execution of contracts concluded with Counterparties, collecting information about the risk associated with the region and type of such transactions.

Responsible departments are responsible for risk assessment during transactions. A transaction must be identified as having a high degree of risk when the following cases occur:

- 1) Mined or processed precious metals were transported through the Conflict Regions;
- 2) The information provided by the supplier differs significantly from the information received by AMMC.

6 Monitoring of Precious metals

We check actual goods of Precious metals to ensure their consistency with the information acquired by due diligence.

In addition, we monitor that all policies and procedures of AMMC are properly implemented for the Precious metals extracted on mines owned by AMMC.

7 Maintaining records

We properly maintain records of Precious metals for predetermined period.

8 Implementation of education and training

We implement necessary education and training for our executives and employees involved in the promotion of non-use of conflict mineral.

9 Third-party audit

We periodically undergo an independent third-party audit of our management system on conflict-free mineral and the state of it.

Revised : 23 December 2022

Approved

Acting First Deputy Chairman of the Board -

Chief Engineer of JSC "Almalyk MMC"



Larionov S.V.