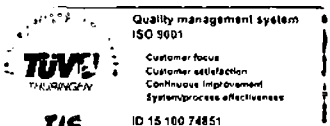


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28.02.2019. г. АМ-СЧ 220

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**SUPPLY CHAIN DUE DILIGENCE POLICY
OF JSC “ALMALYK MMC”**

JSC “Almalyk Mining and Metallurgical Complex” (AMMC), being LBMA accredited Refiner conducts all its operations with the highest ethical and moral standards, and required due-diligence. By implementing Gold Supply Chain Policy AMMC commits to:

- Cooperate with its business partners at highest standards
- Combat systematic or widespread abuses of human rights.
- Avoid any contributions to conflict.
- Comply with high standards of anti-money laundering (AML).
- Combat the financing of terrorism (CFT).
- Exclude any direct or indirect support to non-state armed groups and/or illegally acting public or private security forces.
- Avoid bribery and fraudulent misrepresentation of the origin of gold.
- Conform to all relevant United Nations sanctions resolutions and domestic laws.

All our commitments are achieved by the application, maintenance and continuous improvement of AMMC's management systems, processes and procedures. AMMC requires all staff involved in the gold supply chain to comply with this policy and to strictly follow it through the appropriate management systems in place.

In line with gold sourcing process, AMMC commits to following

Regarding serious abuses associated with the extraction, transport or trade of minerals:

1. We will not tolerate, nor by any means profit from, contribute to, assist with or facilitate the commission by any party of:

- a. any forms of torture, cruel, inhuman and degrading treatment;
- b. any forms of forced or compulsory labor;
- c. any unlawful form of child labor;
- d. other severe human rights violations and abuses such as widespread sexual violence;
- e. war crimes or other serious violations of international humanitarian law, crimes against humanity or genocide.

Regarding risk management of serious abuses:

2. We will reject or immediately suspend engagement with suppliers or customers where we identify a reasonable risk that they are sourcing from, or are linked to, any party committing any of the above-mentioned abuses.

Regarding direct or indirect support to non-state armed groups:

3. We will not tolerate any direct or indirect support to non-state armed groups or their affiliates who:

- a. illegally control mine sites or otherwise control transportation routes, points where gold are traded and upstream participants in the supply chain; and/or
- b. illegally tax or extort money or gold at points of access to mine sites, along transportation routes or at points where gold are traded; and/or
- c. illegally tax or extort intermediaries, export companies or international traders.

Regarding risk management of direct or indirect support to non-state armed groups:

4. We will reject or immediately suspend and discontinue engagement with suppliers or customers where we identify a reasonable risk that they are providing direct or indirect support to non-state armed groups as mentioned above.

Regarding public or private security forces and risk management of public or private security forces:

5. We recognize that the role of public or private security forces at the mine sites and/or surrounding areas and/or along transportation routes is solely to maintain the rule of law, including safeguarding human rights, providing security to mine workers, equipment and facilities, and protecting the mine sites or transportation routes from interference with legitimate extraction and trade. If we identify a reasonable risk that any abovementioned participants in the supply chain directly or indirectly support illegally acting public or private security forces, we will immediately suspend or discontinue engagement with them.

Regarding bribery and fraudulent misrepresentation of the origin of minerals and the payment of taxes, fees and royalties due to governments:

6. We will not offer, promise, give or demand any bribes, and resist the solicitation of bribes to conceal or disguise the origin of gold, to misrepresent taxes, fees and royalties paid to governments for the purposes of gold extraction, trade, handling, transport and export.

Regarding money laundering:

7. We will support efforts and contribute to the prohibition of money laundering, and we commit to reject from counterparties where we identify a reasonable risk of such activity resulting from, or connected to, the extraction, trade, handling, transport or export of gold derived from the illegal taxation or extortion of gold at points of access to mine sites, along transportation routes or at points where gold is traded by upstream participants in the supply chain.

Regarding risk management of bribery and fraudulent misrepresentation of the origin of minerals, money-laundering and payment of taxes, fees and royalties to governments:

8. In accordance with the specific position of the company in the supply chain, we commit to engage with suppliers, central or local governmental authorities, international organizations, civil society and affected third parties, as appropriate, to improve and track performance with a view to preventing or mitigating risks of adverse impacts through measurable steps taken in reasonable timescales. We will suspend or discontinue engagement with upstream suppliers after failed attempts at mitigation.

9. We will adequately store and maintain all records and documentation related to the gold supply chain to demonstrate that required and continuous due diligence is practiced.

We commit to implement, centralize, communicate, monitor, adapt and improve a robust due-diligence management system, which will address:

1. Clear responsibilities and escalation channels for all relevant employees.
2. A risk assessment framework to classify risk associated to the supply chain.
3. Risk mitigation steps based on the risk assessment of suppliers.
4. Mandatory training for all relevant employees.

Through the functional mailbox **compliance@agmk.uz** any employees, as well as stakeholders or counterparties, are given the opportunity and encouraged to express any kind of concern over the Gold Supply Chain and any unexpected related risks.

Deputy General Director

Abdukadirov A.A.