

**«APPROVE»
Chairman of the Board of
“Almalyk MMC” JSC
A.Khursanov**

2026 y.

**PROCEDURE
of supply chain risk assessments
(suppliers/contractors)
“Almalyk MMC” JSC**

1. General Provisions

1.1. JSC "Almalyk MMC" (hereinafter referred to as the "Complex") is committed to the principles of responsible business conduct, including ensuring a high level of ethics, respect for human rights and environmental sustainability in its supply chains.

1.2. This Supply Chain Risk Assessment Procedure (hereinafter referred to as the "Procedure") has been developed to systematically identify, assess and manage risks associated with the activities of significant business partners of the Complex, in accordance with the requirements of the Copper Mark Standard and the Guidelines for the Code of Practice of the Responsible Jewellery Council (RJC).

1.3. The procedure is aimed at ensuring the compliance of the Complex's procurement activities with international standards for responsible copper production, as well as minimizing the risks associated with violation of ethical norms, human rights, environmental standards and legislation.

1.4. The provisions of this Procedure are mandatory for all structural divisions of the Complex involved in supply chain management, as well as for all business partners. The terms of this Procedure, including the requirements for completing the KYC Questionnaire and implementing corrective plans, are included in the contracts and Terms of Reference for Business Partners as essential conditions. The Register of Significant Business Partners is maintained and updated by the Compliance Service.

2. Scope of application

2.1. This Procedure applies to the procurement processes of goods, works and services of the Complex, except for the procurement of mineral raw materials, as well as to interaction with suppliers, contractors and other partners whose activities affect the compliance of the Complex with international standards of responsible production. Mineral raw materials are understood as raw materials directly used in the production process of the works, including ore, concentrates and other mineral materials for the extraction and processing of copper.

3. Definitions

3.1. **Significant business partners** are legal entities and individuals (suppliers, contractors and other partners) selected on the basis of the criteria of financial significance, criticality for operations, duration of cooperation, potential riskiness and impact on the responsible practices of the Complex.

3.2. **Risk assessment** is the process of identifying, analyzing and classifying risks in the activities of business partners in order to determine measures to minimize and manage them.

3.3. **Supplier Questionnaire (KYC)** – a standardized form for collecting data on business partners, used for risk assessment in accordance with the requirements of the Copper Mark and RJC.

3.4. **Risk Matrix** is a tool for assessing the severity of consequences and the probability of risks, presented in the form of a 3x3 table.

3.5. **Register of significant business partners** is a systematized list of legal entities and/or individuals with whom the Works has or plans to establish business relations, whose activities can significantly affect compliance with standards of responsible production.

3.6. **Business partners** are legal entities and individuals (suppliers, contractors, clients, consultants and other counterparties) with whom the Complex builds contractual and other forms of interaction within the framework of business activities aimed at ensuring the continuity of operations, achieving economic goals and complying with applicable legal requirements and corporate standards.

4. Management and Responsibility Bodies

4.1. **The Management Board of the Works** supervises the implementation of the Procedure and makes decisions on key risk management issues.

4.2. **All subdivisions engaged in procurement activities:**

organizes the distribution of the Supplier Questionnaire (KYC) and the collection of responses from partners.

transfers the collected data to the Compliance Service within 2 business days after receiving the completed KYC.

ensures that partners are informed about the Code of Conduct for Suppliers of the Works by including relevant obligations in contracts and through available communication channels.

respects the confidentiality of the data received.

4.3. **Compliance Service:**

maintain and update the register of significant business partners in accordance with the criteria set out in clause 6.1.1.

develops and updates the KYC Questionnaire and Risk Matrix.

conducts data analysis and prepares a Risk Assessment Report.

publishes the results of the risk assessment

organizes on-site inspections at the facilities of high-risk partners, if necessary.

develops action plans for the development of responsible practices among significant business partners.

monitors the implementation of the action plan for the development of responsible practices among significant business partners.

organizes seminars, meetings and trainings for partners on environmental management, labor rights and ethics.

establishes regular communication channels (e.g., quarterly meetings, newsletters).

encourages partners to obtain certifications (e.g., ISO 14001, SA8000).

ensures that risk mitigation obligations are included in contracts with partners.

4.4 The procurement unit (Contractor) is responsible for collecting the completed KYC Questionnaire and accompanying documents, verifying the completeness of the data and submitting it to the Compliance Service within two working days after receiving the package of documents.

4.5 The Compliance Service is responsible for analysing the data received, conducting a risk assessment, assigning a risk rating, preparing a report and recommendations, as well as endorsing the contract after the completion of the risk assessment in accordance with this Procedure.

5. Risk categories and classification

5.1. The procedure provides for the assessment of the following risk categories:

Ethical and governance risks: corruption, bribery, fraud, weak corporate governance.

Human rights and labour risks: use of child or forced labour, unsafe working conditions, unfair wages, lack of protection for workers.

environmental risks: environmental pollution, overuse of natural resources, improper waste disposal.

Risks in the field of impact on communities and social risks: land disputes, lack of interaction with local communities.

Compliance risks: violation of labor, environmental or trade laws, lack of necessary permits.

5.2. Risks are classified as:

low risk: insignificant impact on the Complex's activities and low probability of occurrence.

medium risk: moderate impact and/or medium probability of occurrence.

high risk: Significant impact and high probability of occurrence requiring immediate action.

6. Risk Assessment and Management Process

6.1. Stage 1: Identification of significant business partners

6.1.1. Significant Business Partners are determined by the Compliance Service on an annual basis by analyzing the full list of counterparties in accordance with the following criteria:

Scale of financial interaction — the total amount of obligations under agreements (contracts) concluded with a business partner during a calendar year exceeds 0.1% (zero point one percent) of the approved annual procurement plan of the relevant structural unit of Almalyk MMC JSC. This threshold is subject to annual review and updating in January of each year on the basis of the approved procurement budget, taking into account indexation to the level of inflation and changes in the production program of the Complex.

Other criteria (criticality for production operations, stability of business relations, potential riskiness of the partner's activities, as well as the degree of impact on compliance with the principles of responsible production in accordance with the Copper Mark standards and the RJC Code of Practice) are used as additional factors for inclusion in the Register of partners who have not reached the threshold value for the financial criterion, but represent an increased level of risk or strategic importance for the activities of the Company.

6.1.2. The Register of significant business partners is formed and approved.

6.2. Step 2: Data Collection

6.2.1. **Supplier Questionnaire (KYC):** sent to all suppliers, contractors and other partners in Uzbek, Russian or English with a request to provide data within 2 working days. The questionnaire is sent and information is collected before the conclusion of the contract in cases where the procurement process involves direct interaction and negotiations with the partner (for example, direct contracts, tenders, selections and similar procedures where pre-contractual exchange of information is possible). In such cases, filling out and providing KYC is a mandatory requirement for the partner before entering into the contract. For purchases through automated electronic platforms, where sending KYC before the conclusion of the contract is technically or process-wise impossible (for example, electronic stores, online platforms and similar systems without pre-contractual communication), the questionnaire is sent after the conclusion of the contract.

6.2.2. **Secondary Research:** Analysis of publicly available sources (media, government registries, databases such as the Business & Human Rights Resource Centre).

6.2.3. **On-site inspections:** are carried out for high-risk partners in order to assess working conditions, environmental practices and compliance with standards. Partners undertake to allow representatives of the Works to conduct on-site inspections at their facilities in case of assigning a high level of risk.

6.2.4. **Dialogue:** clarification of data through calls or meetings with partners.

6.3. Step 3: Risk Assessment

6.3.1. Risks are assessed using the Risk Matrix (Appendix 2) according to the following parameters:

materiality: the degree of potential impact on the Complex's activities.

probability: The chance of a risky event occurring.

6.3.2. Each partner is assigned a risk rating (low, medium, high) in accordance with Table 3x3.

6.4. Step 4: Documenting the results

6.4.1. The Compliance Service shall prepare a Risk Assessment Report, including:
the purpose of the assessment and references to the Copper Mark and RJC standards.
a list of partners from the Register.

A description of the identified risks, their severity, probability, and rating.
data from KYC questionnaires, surveys, and on-site inspections.

recommendations for risk management.

6.5. Step 5: Risk Management

6.5.1. **Low-risk partners:** annual monitoring and self-assessment.

6.5.2. **Medium Risk Partners:** Provide training and resources to resolve issues for 3 months.

6.5.3. **High-risk partners:** immediate on-site audit, development of corrective plans, suspension of cooperation until violations are eliminated. Initiation and decision-making on the suspension of cooperation is carried out by the Chairman of the Management Board of the Complex on the basis of the recommendations of the Compliance Service.

6.5.4. Obligations to reduce risks are included in contracts with partners with reference to the Supplier Code of Conduct.

7. Tools and Resources

7.1. **Supplier Questionnaire (KYC):** Word/PDF form (Appendix 1) for collecting risk data.

7.2. **Risk matrix:** table in Excel/Google Sheets format (Appendix 2).

7.3. **RJC Guidelines:** Code of Practice (available on www.responsiblejewellery.com).

7.4. **Open sources:** state websites of Uzbekistan, databases (for example, the Ministry of Ecology, Business & Human Rights Resource Centre).

8. Monitoring and reporting

8.1. The Procedure and the Register shall be reviewed annually or in case of a change in the status of partners.

8.2. The risk assessment report, KYC questionnaires and the register of significant business partners are subject to publication on the official website of the Combine. Publication is carried out taking into account the requirements of confidentiality and without disclosing trade secrets.

8.3. Documentation is stored in the centralized system for at least 5 years.

8.4. Violations and complaints are received through the confidential mechanism of the Compliance Control Service, which ensures the protection of whistleblowers from retaliation and guarantees the safety and reliability of messages. Communication channels include:

Website: <https://agmk.uz/ru/virtual>

E-mail: Mail: info@agmk.uz

Phone: +99870 619-23-33

9. Training Program and Communication

9.1. Affiliates are notified of the Procedure, Code of Conduct and KYC Questionnaire requirements in writing and at meetings.

9.2. Employees of the Complex are trained in the use of the KYC Questionnaire and the Risk Matrix.

9.3. Partners are provided with support (templates, consultations) for the implementation of responsible practices.

10. Compliance and Sanctions

10.1. Failure to comply with the Procedure by partners entails:
corrective measures and the establishment of deadlines for their implementation.
suspension or termination of contracts in the absence of progress.

The relevant terms of suspension and termination of contracts are included in contracts with business partners.

10.2. The Complex reserves the right to check the data from the KYC Questionnaires.

10.3. Partners are obliged to cooperate in investigations and provide the necessary documents.

11. Final Provisions

11.1. This Procedure shall enter into force upon approval and shall be subject to review once a year or if necessary.

11.2. All divisions of the Complex and business partners are required to comply with the Procedure to ensure compliance with the Copper Mark, RJC standards and the principles of sustainable supply chain management.

Supplier Verification Questionnaire (KYC)

This questionnaire is part of Almalyk MMC's due diligence process to assess supply chain risks, as required by the Copper Mark Responsible Minerals Initiative and the Responsible Jewellery Council (RJC) standards. Your answers will help us assess the ethical, labor, environmental, community, and compliance risks in our business relationships.

Instructions:

Fill in all sections accurately and provide supporting documents where required (e.g., policies, certificates).

Responses are confidential and will be used solely for compliance purposes.

1. Supplier Information

1. **Company Name:** _____
2. **Address:** _____
3. **Contact person:** _____
 1. Email: Mail: _____
 2. Phone: _____
4. **Nature of activity (e.g. chemicals, logistics):**

5. **Number of employees (number of employees):** _____
6. **Supply chain description (e.g., local/global, key suppliers):**

2. Ethical and governance risks

1. **Do you have a written anti-corruption policy?**
 Yes (*attach policy*) No
2. **Have you been fined or investigated for bribery, fraud or corruption in the last 5 years?**

Yes (*please provide details:* _____) No

3. **Do you provide anti-corruption training to employees?**

Yes No

4. **Are your financial policies or audit reports publicly disclosed?**

Yes No

5. **Do you have anti-bribery management certification (e.g. ISO 37001)?**

Yes (*insert certificate number:* _____) No

3. Human rights and labour risks

1. **Do you have policies prohibiting child labor (under 15 years of age) and forced labor?**

Yes (*attach policy*) No

2. **Do all your employees have written employment contracts?**

Yes No (*percentage of employees without contracts:* ____%)

3. **Have you had any complaints, fines or labour-related strikes in the last 5 years?**

Yes (*please provide details:* _____) No

4. **Do you provide personal protective equipment (PPE) and safety training to workers?**

Yes No

5. **Do you have a grievance mechanism in place for workers to report concerns anonymously?**

Yes No

6. **Do you have a social responsibility certification (e.g., SA8000)?**

Yes (*insert certificate number:* _____) No

4. Environmental risks

1. **Do you have an environmental management policy or system?**

Yes (*attach policy*) No

2. **Do you have a certification in environmental management (e.g. ISO 14001)?**

Yes (*insert certificate number:* _____) No

3. **Have you been fined or prosecuted for environmental violations (e.g., spills, emissions) in the last 5 years?**

Yes (*please provide details:* _____) No

4. **Do you have procedures in place for the safe handling and disposal of hazardous materials?**

Yes (*attach procedures*) No

**5. Exposure risks
on communities and social risks**

1. **Do you engage with local communities near your facilities (e.g., consultations, meetings)?**
 Yes (*describe the process:* _____) No
2. **Have you experienced protests, controversies, or complaints from communities in the last 5 years?**
 Yes (*please provide details:* _____) No
3. **Do you have a complaint mechanism in place for communities to report concerns?**
 Yes No

**6. Compliance risks
Legislation and Regulations**

1. **Have you been fined or prosecuted for violating labor, environmental, or trade laws in the last 5 years?**
 Yes (*please provide details:* _____) No
2. **Do you comply with all applicable laws in Uzbekistan (e.g. labor, environmental)?**
 Yes No (*explain:* _____)
3. **Do you have all the necessary permits for your operations (e.g. environmental, for hazardous materials)?**
 Yes (*list permissions:* _____) No
4. **Do you work in conflict zones or high-risk jurisdictions?**
 Yes (*specify location:* _____) No

7. Declaration and submission

I confirm that the information provided in the application form is accurate and complete, to the best of my knowledge. I understand that JSC "Almalyk MMC" may verify the information and request additional documents.

Authorized representative:

Name: _____

Job Title: _____

Signature: _____ Date: _____

Annex 2
to the Supply Chain Risk
Assessment Procedure
“Almalyk MMC” JSC

Counterparty Verification Report

Counterparty: _____ (Name of the legal entity)

Evaluation Date: _____

Responsible employee: _____ (Name, position, Compliance Service)

Step	Action	Status	Risk Rating	Notes/Actions
1. Verification of supplier information (KYC, section 1)				
1.1	Verify company name and address (KYC 1.1–1.2).	<input type="checkbox"/> Completed	N/A	Check registration with the tax authorities of Uzbekistan.
		<input type="checkbox"/> In the process		
		<input type="checkbox"/> Not completed		
1.2	Verify the contact person (full name, email, phone number) (KYC 1.3).	<input type="checkbox"/> Completed	N/A	Make sure that the contacts are valid.
		<input type="checkbox"/> In the process		
		<input type="checkbox"/> Not completed		
1.3	Assess the nature of the activity and the supply chain (KYC 1.4, 1.6).	<input type="checkbox"/> Completed	N/A	Indicate if the activity is related to high-risk industries (for example, chemicals).
		<input type="checkbox"/> In the process		
		<input type="checkbox"/> Not completed		
1.4	Confirm the number of employees (KYC 1.5).	<input type="checkbox"/> Completed	N/A	Note if the number affects responsible practices (>100 employees).
		<input type="checkbox"/> In the process		
		<input type="checkbox"/> Not completed		
2. Ethical Risk Assessment (KYC, Section 2)				
2.1	Check for anti-corruption policies (KYC 2.1).	<input type="checkbox"/> Yes	<input type="checkbox"/> Low	Request a document if it is missing.
		<input type="checkbox"/> Partially	<input type="checkbox"/> Medium	
		<input type="checkbox"/> No	<input type="checkbox"/> High	
2.2	Check fines/investigations for corruption for 5 years (KYC 2.2).	<input type="checkbox"/> Yes	<input type="checkbox"/> Low	Clarify the details through desktop research (Section 6.2.2).
		<input type="checkbox"/> Partially	<input type="checkbox"/> Medium	
		<input type="checkbox"/> No	<input type="checkbox"/> High	

2.3	Confirm anti-corruption training (KYC 2.3).	<input type="checkbox"/> Yes	<input type="checkbox"/> Low	Recommend training if not available.
		<input type="checkbox"/> Partially	<input type="checkbox"/> Medium	
		<input type="checkbox"/> No	<input type="checkbox"/> High	
2.4	Check for public disclosure of financial data (KYC 2.4).	<input type="checkbox"/> Yes	<input type="checkbox"/> Low	Assess transparency through open sources.
		<input type="checkbox"/> Partially	<input type="checkbox"/> Medium	
		<input type="checkbox"/> No	<input type="checkbox"/> High	
2.5	Check ISO 37001 (KYC 2.5) certification.	<input type="checkbox"/> Yes	<input type="checkbox"/> Low	Request a certificate, if claimed.
		<input type="checkbox"/> Partially	<input type="checkbox"/> Medium	
		<input type="checkbox"/> No	<input type="checkbox"/> High	
3. Occupational Risk Assessment (KYC, Section 3)				
3.1	Check the Anti-Child/Forced Labor Policy (KYC 3.1).	<input type="checkbox"/> Yes	<input type="checkbox"/> Low	Request a document if it is missing. High risk in the presence of disorders.
		<input type="checkbox"/> Partially	<input type="checkbox"/> Medium	
		<input type="checkbox"/> No	<input type="checkbox"/> High	
3.2	Confirm the existence of employment contracts (% without contracts) (KYC 3.2).	<input type="checkbox"/> Yes	<input type="checkbox"/> Low	Indicate % and recommend correction if >5%.
		<input type="checkbox"/> Partially	<input type="checkbox"/> Medium	
		<input type="checkbox"/> No	<input type="checkbox"/> High	
3.3	Check labor complaints/fines for 5 years (KYC 3.3).	<input type="checkbox"/> Yes	<input type="checkbox"/> Low	Conduct an on-site inspection if there are complaints (section 6.2.3).
		<input type="checkbox"/> Partially	<input type="checkbox"/> Medium	
		<input type="checkbox"/> No	<input type="checkbox"/> High	
3.4	Confirm the provision of PPE and security training (KYC 3.4).	<input type="checkbox"/> Yes	<input type="checkbox"/> Low	Recommend training if not available.
		<input type="checkbox"/> Partially	<input type="checkbox"/> Medium	
		<input type="checkbox"/> No	<input type="checkbox"/> High	
3.5	Check the anonymous complaint mechanism (KYC 3.5).	<input type="checkbox"/> Yes	<input type="checkbox"/> Low	Request a description of the mechanism, if not available.
		<input type="checkbox"/> Partially	<input type="checkbox"/> Medium	
		<input type="checkbox"/> No	<input type="checkbox"/> High	
3.6	Check SA8000 certification (KYC 3.6).	<input type="checkbox"/> Yes	<input type="checkbox"/> Low	Request a certificate, if claimed.

		<input type="checkbox"/> Partially	<input type="checkbox"/> Medium	
		<input type="checkbox"/> No	<input type="checkbox"/> High	
4. Environmental Risk Assessment (KYC, Section 4)				
4.1	Review the environmental policy/management system (KYC 4.1).	<input type="checkbox"/> Yes	<input type="checkbox"/> Low	Request a document if it is missing.
		<input type="checkbox"/> Partially	<input type="checkbox"/> Medium	
		<input type="checkbox"/> No	<input type="checkbox"/> High	
4.2	Check ISO 14001 (KYC 4.2) certification.	<input type="checkbox"/> Yes	<input type="checkbox"/> Low	Request a certificate, if claimed.
		<input type="checkbox"/> Partially	<input type="checkbox"/> Medium	
		<input type="checkbox"/> No	<input type="checkbox"/> High	
4.3	Check environmental violations for 5 years (KYC 4.3).	<input type="checkbox"/> Yes	<input type="checkbox"/> Low	Check through the Ministry of Ecology of Uzbekistan (Section 7.4).
		<input type="checkbox"/> Partially	<input type="checkbox"/> Medium	
		<input type="checkbox"/> No	<input type="checkbox"/> High	
4.4	Review hazardous materials handling procedures (KYC 4.5).	<input type="checkbox"/> Yes	<input type="checkbox"/> Low	Request a document if it is missing.
		<input type="checkbox"/> Partially	<input type="checkbox"/> Medium	
		<input type="checkbox"/> No	<input type="checkbox"/> High	
5. Social Risk Assessment (KYC, Section 5)				
5.1	Verify community engagement (KYC 5.1).	<input type="checkbox"/> Yes	<input type="checkbox"/> Low	Evaluate the process through dialogue with the partner (Section 6.2.4).
		<input type="checkbox"/> Partially	<input type="checkbox"/> Medium	
		<input type="checkbox"/> No	<input type="checkbox"/> High	
5.2	Check community protests/disputes/complaints for 5 years (KYC 5.2).	<input type="checkbox"/> Yes	<input type="checkbox"/> Low	Check through the media and the Business & Human Rights Resource Centre (Section 6.2.2).
		<input type="checkbox"/> Partially	<input type="checkbox"/> Medium	
		<input type="checkbox"/> No	<input type="checkbox"/> High	
5.3	Check the complaint mechanism for communities (KYC 5.3).	<input type="checkbox"/> Yes	<input type="checkbox"/> Low	Request a description of the mechanism, if not available.
		<input type="checkbox"/> Partially	<input type="checkbox"/> Medium	
		<input type="checkbox"/> No	<input type="checkbox"/> High	
6. Legal Risk Assessment (KYC, Section 6)				

6.1	Check fines for violation of legislation for 5 years (KYC 6.1).	<input type="checkbox"/> Yes	<input type="checkbox"/> Low	Check through the state registers (section 6.2.2).
		<input type="checkbox"/> Partially	<input type="checkbox"/> Medium	
		<input type="checkbox"/> No	<input type="checkbox"/> High	
6.2	Prove compliance with the laws of Uzbekistan (KYC 6.2).	<input type="checkbox"/> Yes	<input type="checkbox"/> Low	Clarify the reasons for non-compliance, if indicated.
		<input type="checkbox"/> Partially	<input type="checkbox"/> Medium	
		<input type="checkbox"/> No	<input type="checkbox"/> High	
6.3	Проверить наличие всех разрешений (KYC 6.3).	<input type="checkbox"/> Yes	<input type="checkbox"/> Low	Request a list of permissions if not available.
		<input type="checkbox"/> Partially	<input type="checkbox"/> Medium	
		<input type="checkbox"/> No	<input type="checkbox"/> High	
6.4	Verify operation in conflict/high-risk areas (KYC 6.4).	<input type="checkbox"/> Yes	<input type="checkbox"/> Low	Conduct an on-site inspection if there are zones (section 6.2.3).
		<input type="checkbox"/> Partially	<input type="checkbox"/> Medium	
		<input type="checkbox"/> No	<input type="checkbox"/> High	
7. Verification of the declaration (KYC, section 7)				
7.1	Confirm a signed data accuracy declaration (KYC 7.1).	<input type="checkbox"/> Yes	N/A	Request a signature if missing.
		<input type="checkbox"/> Partially		
		<input type="checkbox"/> No		
7.2	Verify the representative's full name, position, signature, and date (KYC 7.2–7.5).	<input type="checkbox"/> Yes	N/A	Clarify the representative's data if incomplete.
		<input type="checkbox"/> Partially		
		<input type="checkbox"/> No		
8. Final risk assessment				
8.1	Assign an overall risk rating using the Risk Matrix (Section 6.3, Appendix 2).	<input type="checkbox"/> Completed	<input type="checkbox"/> Low	Indicate the final rating (for example, High in case of environmental violation).
		<input type="checkbox"/> In the process	<input type="checkbox"/> Medium	
		<input type="checkbox"/> Not completed	<input type="checkbox"/> High	
8.2	Develop an action plan (Section 6.5):	<input type="checkbox"/> Completed	N/A	For example, "Audit until 30.09.2025, ISO 14001 certification".
	- Low: self-esteem	<input type="checkbox"/> In the process		
	- Intermediate: training (3 months)	<input type="checkbox"/> Not completed		

	- High: Audit, Suspension			
9. Documentation and reporting				
9.1	Enter data in the Register of significant business partners (Appendix 3).	<input type="checkbox"/> Completed	N/A	Update the Registry within 30 days of the report (Section 6.5).
		<input type="checkbox"/> In the process		
		<input type="checkbox"/> Not completed		
9.2	Include the results in the Risk Assessment Report (Section 6.4).	<input type="checkbox"/> Completed	N/A	Prepare a report within 10 days of the assessment (Section 6.4).
		<input type="checkbox"/> In the process		
		<input type="checkbox"/> Not completed		
9.3	Upload the report and KYC to the centralized system (section 8.3).	<input type="checkbox"/> Completed	N/A	Keep data for 5 years, ensure confidentiality.
		<input type="checkbox"/> In the process		
		<input type="checkbox"/> Not completed		

RESULT OF THE CHECK

Overall risk rating: Low Medium High

Recommendations:

If there is no data, send a request to the counterparty (7 business days).

If there is a high risk, initiate an on-site inspection or audit.

Escalate issues to the Management Board of the Complex for high-risk partners.

Next steps:

Update the Register of significant business partners (Appendix 3).

Prepare a Risk Assessment Report for publication on the AMMC website (Section 8.2).

Notify the partner of the results and action plan through info@agmk.uz.

Signature of the responsible person: _____

Date: _____

Risk Matrix template

Materiality / Probability	Low	Medium	High
Low	<i>Low</i>	<i>Low</i>	<i>Medium</i>
Medium	<i>Low</i>	<i>Medium</i>	<i>High</i>
High	<i>Medium</i>	<i>High</i>	<i>High</i>

Instructions:

Assess the risks by materiality (impact) and probability (chance).

Document the ratings in the Risk Assessment Report.

Annex 4
to the Supply Chain Risk
Assessment Procedure
“Almalyk MMC” JSC

REGISTER OF SIGNIFICANT BUSINESS PARTNERS

№	1.Name of the partner	2.Partner Type	3.Contact person (full name, position, e-mail, phone number)	4.Services/Products	5.Financial significance (\$/year or % of budget)	6.Criticality for operations	7.Duration of cooperation (years)	8.Riskiness (industry/region)	9.Impact on responsible practices	10.Date of the last KYC questionnaire	11.Ethical risks	12.Labor risks	13.Environmental risks	14.Social risks	15.Legal risks	16.Overall Risk Rating	17.Action plan	18.Deadline	19.Status	20.Responsible
1																				
2																				
3																				
4																				
5																				
...																				

FILLING INSTRUCTIONS

COLUMN EXPLANATIONS

1. The register is maintained in Excel/Google Sheets format, with all columns required to be filled in. 2. Significant Business Partners are determined based on the criteria specified in Section 6.1.1

Procedures:

Scope of Financial Interaction: Contracts >0.1% of the Annual Procurement Budget.

Critical to operations: Sole suppliers or key services. Potential risk: High-risk industries (e.g., chemical) or regions. Impact on responsible practices: Impact on Copper Mark and RJC standards.

3. Risk ratings (low, medium, high) are assigned on the basis of the Risk Matrix (Appendix 2 of the Procedure). 4. The Register shall be updated after each risk assessment (Section 6.5 of the Procedure) indicating the actions and status. 5. Access to the register is limited to authorized employees (Compliance Service, Financial Risk and Covenant Management Division, Legal Department).

1. No: The serial number of the partner in the register.

2. Name of the partner: The full legal name of the company.

3. Type of partner: Indicate whether the partner is a supplier, contractor or other type of counterparty.

4. Contact person: name, position, e-mail and phone number of the responsible representative.

5. Services/Products: A brief description of the goods/services provided (e.g. chemicals, logistics).

6. Financial significance: The annual volume of the contract in US dollars or a percentage of the procurement budget.

7. Critical for operations: Specify whether the partner is a sole supplier or a mission-critical partner.

8. Duration of cooperation: The duration of the contract or cooperation in years. 9. Riskiness: A description of the industry or region that increases the risk (e.g., chemicals, conflict zone).

10. Impact on responsible practices: A description of the factors affecting standards (e.g., headcount, hazardous materials).

11. Date of the last KYC questionnaire: Date of receipt of the last completed KYC questionnaire.

12-16. Ethical/Labor/Environmental/Social/Legal Risks: Indicate the rating (low, medium, high) and a brief description of the risks identified for each category (Section 5.1 of the Procedures).

12. Overall Risk Rating: The final rating (low, medium, high) based on the Risk Matrix (Section 6.3).

13. Action Plan: Risk management measures (e.g., audit, training, certification) in accordance with section 6.5.

14. Due date: The date by which the actions must be completed.

15. Status: The current status of the plan (e.g., in progress, pending, completed).

16. Responsible: The unit or person responsible for performing the activities (e.g., Financial Risk and Covenant Management).

Signature of the person responsible for maintaining the register: _____

Registry update date: _____

