

“Uzbekistan Technological Metals Combine” JSC

INTERIM REPORT on Mineral Supply Chain Due Diligence (Step 5 of the OECD Guidance)

for the period from 1 July 2025 to 31 August 2026

Chirchik

1. About the Combine and this Report

Company name: “Uzbekistan Technological Metals Combine” JSC (АО «Узбекский комбинат технологических металлов»)

RMI facility ID (CID): CID002660

Location: 1 Vohid Khaydarov Street, Chirchik, Tashkent Region, 111709, Republic of Uzbekistan

Mineral processed: tungsten

Reporting period: 1 July 2025 – 31 August 2026

Website: uztnmk.uz

1.1. “Uzbekistan Technological Metals Combine” JSC (hereinafter, the Combine) is a processor of tungsten raw materials and a producer of tungsten products. Processing takes place at the Rare Metals and Hard Alloys Plant in Chirchik (hereinafter, the Plant). Tungsten raw material comes from the Combine’s own source and from a supplier in the Republic of Uzbekistan. In addition to tungsten products, the Combine produces molybdenum and rhenium products, which are outside the scope of this report. The Combine is a member of the Minor Metals Trade Association (MMTA).

1.2. This report has been prepared in accordance with Step 5 of the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (hereinafter, the OECD Guidance), the RMAP Tungsten Standard and Chapter 12 of the Regulation on the Mineral Supply Chain Due Diligence System (hereinafter, the Due Diligence System Regulation).

1.3. This is an interim report. The reporting period of the Annual Due Diligence Report is the calendar year; the first Annual Report, for 2026, will be published no later than 30 June 2027. This report covers the time from the end of the period of the first independent RMAP assessment (30 June 2025) to 31 August 2026, so that there is no gap in the Combine’s public reporting. Events after 31 August 2026 are described in Chapter 9.

2. Scope and Governance

2.1. The due diligence system covers tungsten-bearing mineral raw material in all forms — ores, concentrates, intermediate products, secondary material and material received under tolling arrangements — delivered to the Combine by external suppliers and from its own deposits and tailings facilities. Molybdenum and rhenium raw material that does not contain tungsten is outside the scope.

2.2. The Chairman of the Management Board takes decisions on sourcing material from conflict-affected and high-risk areas (hereinafter, CAHRAs), on suspending, terminating and resuming relationships with suppliers and on notifying government authorities, conducts the management review and approves the due diligence report. The Head of the ESG Department is the designated senior manager responsible for the system: organises its functioning and the preparation of the report, reports to and has direct access to the Chairman of the Management Board.

3. Step 1. Management Systems

3.1. Policy. The Combine has adopted the Responsible Mineral Supply Chain Policy. It covers all risks listed in Annex II of the OECD Guidance, sets out requirements for suppliers and the consequences of non-compliance, is published at <https://uztmk.uz/en/responsible> and is sent to suppliers with acknowledgement of receipt. The requirements of the Responsible Mineral Supply Chain Policy are incorporated into supply contracts by means of a contractual clause.

3.2. System documents. Following the first independent assessment (July 2025), the Combine introduced due diligence procedures under its corrective action plan on 1 December 2025 and a revised edition of them on 17 July 2026. The current edition was approved on 17 September 2026: the Due Diligence System Regulation and the procedures for CAHRA identification, counterparty checks and risk assessment, material traceability and training, aligned with the Combine's general documents on contracting, counterparty checks and incoming inspection of raw materials. The approach to identifying and assessing risks in Chapter 4 is described according to the current edition.

3.3. Traceability. Every lot of raw material is accepted with a check of the accompanying documents, weighing, sampling and analysis at the Plant's laboratory. Since July 2025 a separate Lot Register for tungsten-bearing raw material has been maintained, recording for each lot its source and origin, mass, WO₃ content and acceptance documents; receipts recorded in the Lot Register are reconciled with the Plant's material balance.

3.4. Grievance mechanism. Any person may raise concerns relating to the supply chain, including anonymously and without risk of retaliation: hotline (93) 123-02-22, Telegram @komplayens_uztmk, e-mail anticor@uztmk.uz, website uztmk.uz. Grievances are reviewed by the Compliance Service. The Combine recognises the external industry mechanism — the Minerals Grievance Platform.

3.5. System records are retained for at least five years.

4. Step 2. Risk Identification and Assessment

4.1. Sources of raw material in the reporting period:

Type of supply	Country of origin and transit	Type of material	Share of receipts by WO ₃
The Combine's own source	Republic of Uzbekistan	primary, concentrate	32%
Supplier in the Republic of Uzbekistan holding a subsoil use permit; the material is collected from the supplier's site by the Combine's forwarding agent	Republic of Uzbekistan	primary, concentrate	68%

A total of 51 lots were accepted in the period. No secondary material, material under tolling arrangements or imported material was received. No points of aggregation or transformation were identified in the supply chain: the concentrate is delivered without loss of lot identity. The supplier's name is not disclosed as it is commercially confidential; it is made available to the RMAP assessor.

4.2. CAHRA identification. The Compliance Service determines whether the countries of origin and transit of the material and the countries of the counterparty are CAHRAs, using an approved rule based on the lists adopted in the United States and the European Union, international sanctions regimes and open international indices. The Republic of Uzbekistan is assessed under the same rule as any other country. Result: CAHRA Determination Protocol No. 1 of 15 September 2026, CAHRA Conclusion for the Republic of Uzbekistan — “not a CAHRA”. No material from or through CAHRAs was received in the reporting period. The CAHRA List is reviewed at least once every twelve months and whenever circumstances change.

4.3. Supply chain assessment. For each supply flow — counterparty, declared origin and route — the Compliance Service checks the plausibility of the declared origin and the red flags of the OECD Guidance and, if a red flag is triggered, carries out an enhanced assessment against Annex II. Own sources are assessed on the same basis as purchased material. As a result, each supply flow is assigned to one of the risk categories established by the RMAP standard.

4.4. Results. No red flags were triggered for either of the two supply flows. The supplier holds a valid subsoil use permit for tungsten and a licence; the declared volumes, route and composition of the material are plausible. Both supply flows were assigned to Category 1 — low risk (Supply Chain Conclusions of 18 September 2026) and entered in the Supply Chain Risk Register. No Annex II risks of the OECD Guidance were identified.

5. Step 3. Risk Response

5.1. No risks requiring mitigation were identified in the reporting period. No risk mitigation plans were drawn up, no relationships with suppliers were suspended or terminated, and no notifications were sent to government authorities.

5.2. There were no material discrepancies in the origin or integrity of lots (broken seals, missing documents, inconsistency with the declared origin). For some lots the WO₃ content determined by the Plant's laboratory differed from that stated in the supplier's certificate of quality. They were settled as provided in accordance with contract clauses.

6. Step 4. Independent Assessment

The Combine participates in the Responsible Minerals Assurance Process (RMAP) of the Responsible Minerals Initiative (RMI). RMI assessor: Arche Advisors (lead auditor). The first independent assessment was conducted on 22–23 July 2025 for the period from 1 July 2024 to 30 June 2025. Following it, the Combine has been implementing a corrective action plan: documents and records have been prepared for all non-conformances. The re-assessment is scheduled for 22–23 September 2026.

7. Grievances and Training

7.1. No grievances relating to the mineral supply chain were received in the reporting period.

7.2. Training of employees involved in the system was delivered by an external specialist on 18–19 September 2026 and will continue under the annual training plan.

8. Management Review

The management review for the reporting period was conducted by the Chairman of the Management Board on 19 September 2026. The system in its current edition was found to be suitable and adequate for the Combine's supply chain, and the Responsible Mineral Supply Chain Policy was confirmed as up to date.

9. Events after the Reporting Period

On 17 September 2026 the current edition of the system documents was approved. On 15 September 2026 the CAHRA Determination Protocol for the Republic of Uzbekistan was issued, and on 18 September 2026 Supply Chain Conclusions for both sources were issued under the current methodology; the revised Responsible Mineral Supply Chain Policy, the contractual clause and the counterparty questionnaire were sent to the supplier. The composition of raw material sources has not changed since 31 August 2026.

10. Contacts

Questions about this report and the Responsible Mineral Supply Chain Policy: S. M. Murodov, Head of the ESG Department, s.murodov@uztmk.uz. Concerns relating to the supply chain: anticor@uztmk.uz, hotline (93) 123-02-22.

Report prepared by the ESG Department.

Head of the ESG Department



S. M. Murodov

APPROVED

Chairman of the Management Board

“Uzbekistan Technological Metals Combine” JSC



F. Abdullayev

19 September 2026