



APPROVED BY
Chairman of the board of JSC
"Uzbekistan Technological
metals complex"
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"14"  2026 y.

SUPPLY CHAIN POLICY

1. Introduction

Joint-Stock Company “Uzbekistan Technological Metals Complex” (hereinafter – “UZTMK”) is a leading company representing the critical and strategic minerals industry of Uzbekistan at the global level.

UZTMK operates in the field of technological metals such as tungsten, molybdenum, rhenium, graphite, selenium, tellurium, lithium, nickel and cobalt, and, as an important participant in global supply chains, has set as its strategic goal the development of a sustainable and responsible “Metals of the Future” ecosystem.

This Supply Chain Policy is aimed at further strengthening UzTMK’s reputation as a reliable, sustainable and transparent partner in the global market, and sets out our commitment to only purchase materials that are conflict-free and that always meet the requirements of the “OECD Due Diligence Guidance for Responsible Supply Chains or Minerals from Conflict-Affected and High-Risk Areas”, 3rd Edition. As part of this commitment, we conduct a 5-Step due diligence framework outlined in Annex I of the OECD Guidance.

UZTMK condemns the unlawful exploitation of mineral resources, the funding of non-state armed groups, and the violation of human rights in conflict-affected and high-risk areas (CAHRAs). We are committed to ensuring our supply chain is transparent, traceable, and free from 3TG minerals (tin, tantalum, tungsten, and gold) that directly or indirectly finance conflict.

2. Objectives of the Policy

Based on the recommendations of the OECD Annex II and the supplement on Tin, Tantalum, and Tungsten, UZTMK has implemented a Supply Chain Due Diligence Program that sits within a Management framework overseen by the Deputy Chairman of the Management Board for Commercial Affairs and ratified by the General Director and Management Board.

UZTMK adheres to this Program in its purchasing activities and supports suppliers that act in accordance with its policies. UZTMK rejects and/or disengages with suppliers that have been found to, or are suspected of engaging in the following activities or actions:

1. The worst forms of human rights abuses including any form of torture, cruel, inhuman, or degrading treatment, compulsory labor, the worst forms of child labor, other gross human rights violations such as sexual violence, war crimes, crimes against humanity.
2. Direct or indirect support to non-state armed groups.
3. Direct or indirect support, or the involvement of public or private security forces who illegally control mine sites, transportation routes and upstream actors in the supply chain.

4. Bribery, fraudulent misrepresentation, extortion, money laundering resulting from, or connected to the extraction, trade, handling, transport, or export of minerals.
5. Adverse impact of non-payment of taxes, fees, and royalties.

In managing its supply chain, UzTMK seeks to achieve the following strategic objectives:

2.1. Substantive objectives:

- to ensure a responsible, transparent and sustainable supply chain;
- to guarantee safety and legality at the sources of raw materials and components;
- to fully comply with human rights, environmental requirements and labor standards;
- to develop stable partnerships with suppliers in the critical minerals market.

2.2. Strategic objectives:

- to ensure UzTMK's full alignment with international RMI, IRMA, ISO 26000 and ESG standards;
- to strengthen trust mechanisms for long-term cooperation with global technology companies;
- to reduce geopolitical risks in the supply of mineral raw materials;
- to establish a supply system that ensures market and logistics stability.

3. International Norms Underpinning UzTMK's Supply Chain Policy:

This Policy is fully aligned with the following international requirements:

- **OECD Due Diligence Guidance for Responsible Mineral Supply Chains** – requirements for responsible due diligence in mineral supply chains;
- **Responsible Minerals Initiative (RMI)** – requirements of the RMI organization on responsible minerals;
- **IRMA** – International Standard for Responsible Mining;
- **ISO 26000** – International Standard on Social Responsibility;
- **ISO 37001** – International Standard on Anti-Bribery Management Systems;
- **UN Global Compact** – requirements of the UN Global Compact.

These standards contribute to UzTMK's recognition as a reliable supplier in the international market.

UZTMK maintains the following industry memberships and partnerships to ensure that it is apprised of any industry specific information that may impact its sourcing activities or policies, and to share information proactively:

1. Minor Metals Trade Association (MMTA).
2. International Tungsten Industry Association (ITIA).

4. Scope of Application This Policy applies to all entities cooperating with UzTMK, including:

- suppliers of primary Tungsten raw materials;
- logistics and transportation companies;
- processing and waste-management facilities, and suppliers of secondary Tungsten raw materials;
- export–import partners.

UZTMK is committed to actively supporting our customers with their due diligence and disclosure requirements defined in section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act pertaining to "Conflict Minerals" and the regulations promulgated thereunder by the U.S. Securities and Exchange Commission, and EU Regulation 2017/821. Where appropriate, we support the implementation of the principles and criteria of the Extractive Industry Transparency Initiative (EITI), including encouraging suppliers to disclose payments in accordance with the principles set forth under EITI.

5. Policy Implementation and Review:

- The Policy shall be formally communicated to all suppliers.
- The requirements of this Policy shall be incorporated into all contracts.
- The Policy shall be reviewed annually.
- Amendments shall be made in line with international standards and market requirements.

6. Grievance Mechanism

UZTMK maintains an actively monitored grievance reporting mechanism at the following email address: grievance_support@uztmk.uz and actively encourages suppliers, vendors, supply chain actors, or any other concerned individuals to report.

- **Monitoring Status:** Actively monitored with an immediate, system-generated or formal acknowledgment of receipt issued within a maximum of **7 business days**.

To eliminate access barriers and ensure the integrity of the mechanism, UZTMK enforces the following non-negotiable operational protocols:

- **Confidentiality Safeguards:** All reported disclosures and identifying details of the whistle-blower are treated with strict confidentiality. Case files are restricted exclusively to authorized compliance managers.
- **Zero Tolerance for Retaliation:** UZTMK enforces a zero-tolerance policy for any form of retaliation, including but not limited to threats, exclusion, commercial penalties, or contract termination.
- **Non-Waiver of Legal Rights:** Submission of a grievance via this internal channel does not constitute a waiver of the reporter's right to pursue independent state-based judicial remedies or external legal counsel.

Act in any way contrary to maintaining the rule of law, including safeguarding human rights, providing security mine workers, equipment and facilities and protecting the

mine site or transportation routes from interference with legitimate extraction and trade.

7. Final Provisions:

This Supply Chain Policy is a key corporate document that ensures UzTMK's:

- global reputation in the field of critical minerals;
- commitment to sustainable and transparent operations;
- full compliance with international standards;
- ability to access export markets.

This Policy enters into force from the date of its approval by the Company's Management Board.

Where necessary, amendments shall be made to the Policy in line with changes in the market or legislation.

This Policy has been developed in accordance with the following international standards and frameworks: **ISO 26000, ISO 37001, RMI, IRMA, ESG Principles, UN Global Compact.**