"O'ZBEKISTON TEXNOLOGIK METALLAR KOMBINATI" AJ

APPROVED BY

Chairman of the board of JSC
"Uzbekistan Technological metals complex"
________________ F. Abdullayev

"17" июня 2026 y.

KNOW YOUR COUNTERPARTY (KYC) POLICY

1. **Purpose of KYC:**

   UZTMK conducts Know Your Counterparty (KYC) screening to ensure that it is doing business with legitimate, ethical partners and to protect our organization from operational, financial, and reputational risks. By systematically verifying the identity, legal status, and beneficial ownership of our suppliers, we can proactively identify potential "red flags" such as involvement in financial crimes, corruption, money laundering, or severe human rights abuses. This process acts as our first line of defense in supply chain integrity, ensuring that our business relationships comply with global trade regulations and international sanctions. Ultimately, KYC allows us to build a transparent, secure, and resilient supply chain based on mutual trust and shared compliance standards.

2. **Scope**:

   This "Know Your Counterparty" Policy (the **"Policy"**) applies universally to **UZTMK** (the **"Company"**) and all its global subsidiaries, affiliates, and controlled joint ventures.

   The mandates of this Policy apply to all business relationships and transactions involving potential and existing third parties across the entire value chain. This includes, but is not limited to:

   - **Direct and Indirect Suppliers:** Any entity providing raw materials, goods, or services directly to the Company or entering the production stream at any stage.
   - **Upstream and Downstream Partners:** All actors from the point of mineral extraction and processing through to end-product distribution.
   - **Intermediaries and Representatives:** Traders, brokers, agents, distributors, consultants, and any third party acting on behalf of or representing the Company.

   Collectively referred to as the **"Supplier,"** all such entities must be successfully screened and vetted in accordance with the procedures outlined in this Policy prior to the onboarding, signing of any contractual agreement, or issuance of payment.

   The Policy sets out KYC document requirements that apply to all regions where the Company currently source materials or is planning to source material. In each case the responsible or nominated person(s) within the company shall review and comment on the KYC document requirements.

   This policy does not apply for transactions for which the value does not exceed USD 50,000 in any 12 calendar months. Reasonable and appropriate measures should be taken to understand the identity of Counterparty (and their beneficial ownership) to make an informed assessment of any reputational and risk associated with entering into any contemplated business arrangement.

3. **KYC Process**

   Supplier identification requires establishing a verified profile of the Supplier using reliable, independent source documents, data, or information. The Company mandates that the **Supplier Identification Procedure** be strictly executed at three critical stages:

   - **Onboarding:** Upon establishing a new commercial relationship.

- **Transaction Execution:** Prior to executing any formal agreement or specific commercial transaction.
- **Ad-hoc Re-evaluation:** Whenever there is a reasonable doubt regarding the authenticity, veracity, or adequacy of previously obtained supplier identification data.

To facilitate this process, the Company utilizes a comprehensive **KYC Questionnaire**. Completion of this questionnaire is a mandatory prerequisite for the supplier onboarding process. No contract may be signed, nor any transaction executed, until the KYC Questionnaire has been fully completed by the Supplier and the corresponding due diligence review has been successfully performed and approved by the Company.

The following information must be checked by Company appointed Compliance officer or during the vetting process, the Compliance Officer (or designated team) must obtain, verify, and document the following core information:

a) Ultimate Beneficial Ownership (UBO) and Corporate Governance: Identify the true beneficial owners and the Board of Directors of the Supplier. This must be verified by requiring the Supplier to provide an official organizational/shareholding chart, or by cross-referencing information published on the Supplier's official corporate website and corporate registries.

b) Material Provenance and Country of Origin: Determine the exact geographic origin and supply chain route of the materials the Supplier intends to provide. This must be established through direct written inquiry and formal declarations within the KYC Questionnaire.

c) Financial Viability and Creditworthiness: Review the Supplier's audited financial statements to assess financial stability and mitigate counterparty risk. If the Supplier is unable to provide these statements, the Compliance Officer must utilize reputable third-party credit rating services to retrieve financial reports. Any negative findings, adverse credit ratings, or insolvency risks must be formally flagged for management review.

d) Legal Status and Business Licensing: Obtain a valid, current business license or corporate registration certificate. This ensures the Supplier is legally incorporated and authorized to operate under the jurisdiction of their registered country.

e) Industry Program and Transparency Memberships: Verify if the Supplier is a member of recognized industry sustainability or traceability programs, such as the Responsible Minerals Initiative (RMI), the International Tin Supply Chain Initiative (iTSCi), or similar upstream/downstream frameworks. The Supplier must provide their official membership numbers, which the Compliance Officer must independently validate via the respective program's official database.

4. Relevant National and International Sanction Lists

The company is expected to perform sanction checks on all suppliers (including companies, their representatives, and beneficial owners). At a minimum, the sanction review must include the following lists:

1. **UN Security Council Sanctions (UNSC)**
   - "Consolidated List": asset freeze, travel ban, arms embargo.
   - Example: UNSC Resolution 1591 on Darfur.
   - Terrorism-related: UNSC 1267/1989/2253 sanctions regime (ISIL/Al-Qaeda).
2. **Regional and EU Sanctions**
   - EU Sanctions Map: active sanctions regimes.
   - EU Conflict Minerals Regulation (EU) 2017/821: mandatory supply chain checks for CAHRA.
   - RAND Europe maintains EU-recognized CAHRA lists.
3. **National (Uzbekistan) Sanctions Context**
   - Uzbekistan integrates UNSC sanctions into national legislation (e.g., implementation of UNSC Resolution 1540).
   - Financial institutions use consolidated sanctions lists (UN, OFAC, EU, UK, etc.).
4. **Resource and Minerals Sector Risk Control**
   - RMI: CAHRA Procedure Guidance;
   - LME: Guidance Note on CAHRA.

Please note that sanctions lists are updated periodically. The most recent version of each sanction or export control list should be consulted in connection with evaluating a potential contractual relationship or transaction with a Counterparty.

5. Periodic Review and Re-screening (Ongoing Due Diligence)

To ensure that supplier profiles remain accurate and up to date, the Company performs periodic reviews based on the risk levels identified during ongoing commercial transactions. If a Supplier's transactional behavior, volume, or shipping routes deviate from their established profile, the Company will request additional documentation to investigate the inconsistency. This continuous monitoring ensures the Company thoroughly mitigates all supply chain risks identified under its **Due Diligence Procedure**.

Annual and Conditional Renewal Triggers

- **Routine Annual Review:** Comprehensive KYC re-screening must be performed every twelve (12) months from the anniversary date of the initial onboarding or previous review.
- **Inactive or Terminated Accounts:** If a business relationship or agreement has been terminated, suspended, or inactive for more than twelve (12) months, a complete KYC update must be successfully finalized *before* the Company can recommence any business dealings or execute new transactions with that Counterparty.

Required Documentation for Re-screening

During the renewal or re-screening process, the following updated documents must be collected and verified:

a) A newly executed version of the KYC Questionnaire.

b) The current corporate organization and shareholding structure.

c) The latest audited financial statements or an updated third-party credit rating report.

d) A valid, current business license or registration certificate.

Escalation Mechanism

Should any red flags, ambiguities, or compliance issues arise during the KYC or re-screening process that the Sourcing Manager or Compliance Officer cannot independently resolve, the matter must be formally escalated. A final determination will be made via a joint consultation between the Deputy Chairman of the Management Board for Commercial and Marketing Affairs A. Turdibayev, Compliance Service U. Shaxizirova, Head of Legal Department G. Aliyev, Head of the Commercial Department U. Salohutdinov.

Management of KYC Exceptions and Red Flags

If a Sourcing Manager, procurement team member, or any other authorized personnel encounters issues during the vetting process, they must halt onboarding and immediately consult the Compliance Officer. This escalation is mandatory if any of the following situations arise:

- Unresolved questions or ambiguities regarding the KYC process or requirements.
- Persistent difficulties or delays in obtaining the requested documentation or disclosures from the Counterparty.
- Any conflicting data, negative media, or "red flags" discovered through gathered information or publicly available sources regarding the Counterparty.

The Compliance Officer will investigate the concerns and determine the necessary corrective actions, which may include requesting enhanced due diligence or additional supporting information. **Under no circumstances may the Company enter into a contractual relationship, issue a purchase order, or execute a transaction with the Counterparty until all outstanding questions or issues have been formally resolved and cleared by the Compliance Officer.**

6. Documentation, Retention, and Confidentiality

Recordkeeping

Upon receipt and verification of the required KYC information, the Company shall establish and maintain a secure, dedicated compliance file for each Counterparty. All documents, questionnaires, and screening reports must be securely archived in accordance with the Company's data retention policy and applicable legal requirements to ensure a clear audit trail.

Confidentiality Mandate

Status: Strictly Confidential

All data, documentation, and proprietary business information collected from a Supplier during the KYC and due diligence process shall be treated as strictly confidential. The Company mandates that these details are protected against unauthorized access and shall never be disclosed, leaked, or divulged to the Company's other suppliers, customers, or unrelated third parties, except where explicitly required by law or regulatory authorities.