



APPROVED BY

**Chairman of the board of JSC
"Uzbekistan Technological
metals complex"**

F. Abdullayev

[Signature] **2026 y.**

CONFLICT MINERALS POLICY

1. Introduction

Purpose

Joint-Stock Company "Uzbekistan Technological Metals Complex" ("UzTMK") is committed to conducting its mineral sourcing activities in a responsible, transparent and sustainable manner consistent with internationally recognized responsible sourcing standards.

This Conflict Minerals Policy establishes UzTMK's commitment to implementing a risk-based supply chain due diligence system in accordance with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (OECD Guidance), the Responsible Minerals Initiative (RMI) requirements and other internationally recognized responsible sourcing frameworks.

This 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 of 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 is committed to identifying, assessing, preventing, mitigating and accounting for actual and potential adverse impacts associated with the sourcing, transport and trade of minerals throughout its supply chain.

UzTMK does not maintain a policy of automatic disengagement from suppliers or regions solely because they operate in Conflict-Affected and High-Risk Areas (CAHRAs). Instead, the Company applies enhanced due diligence measures and adopts appropriate risk mitigation actions consistent with the OECD Guidance before determining whether business relationships should continue, be suspended or be terminated.

UzTMK strictly prohibits any direct or indirect support to non-state armed groups, serious human rights abuses, bribery, fraudulent misrepresentation, money laundering or other activities prohibited under Annex II of the OECD Due Diligence Guidance.

This Policy applies together with the Company's Supply Chain Policy, Supply Chain Due Diligence Framework, CAHRA Procedure and Know Your Counterparty (KYC) Procedure, which collectively establish UzTMK's responsible sourcing management system.

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.

Although UzTMK currently sources its tungsten concentrate raw materials only in Uzbekistan from its subsidiary mine, the Company recognizes that it needs an appropriate

management system in place to validate the origin of its materials and remains committed to ensure that our procurement procedures remain transparent and in compliance with international requirements.

Objective

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.

Scope

This policy applies to all employees, suppliers, contractors, and business partners, regardless of separate agreements and location. It covers all primary tungsten materials to be procured, or contracted to be manufactured, by UzTMK and its subsidiaries.

This policy applies specifically to those materials named by the Responsible Minerals Initiative (RMI) in their reporting templates. These are: tungsten, tin, tantalum, and gold.

UzTMK has a specifically assigned employee who works on Responsible Minerals Policy and is available for consultation:

Sardor Murodov – Head of ESG department

Email: s.murodov@uztmk.uz

Glossary of terms

3TG: tin, tantalum, tungsten and gold

CAHRAs: Conflict-Affected and High-Risk Areas.

Section 1502 of the Dodd Frank Act names The Democratic Republic of the Congo (DRC) and its nine adjoining countries: Angola, Burundi, Central African Republic, Republic of the Congo, Rwanda, South Sudan, Tanzania, Uganda and Zambia. The list of CAHRAs

updated with additional countries. A current list of affected countries can be found at www.cahraslist.net

CMRT: Conflict Minerals Reporting Template managed and released by the RMI. The minerals reported in this template are 3TG.

EMRT: Extended Minerals Reporting Template managed and released by the RMI. The minerals reported in this template are cobalt, mica, copper, graphite (natural), lithium and nickel.

OECD: Organisation for Economic Co-operation and Development

RMAP: Responsible Minerals Assurance Process

RMI: Responsible Minerals Initiative

Memberships

UZTMK maintains the following industry memberships and partnerships to ensure that it is appraised 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).

2. Responsibilities

Management

Senior Leaders, Directors and Managers must ensure the Company complies with all laws and regulations directly applicable to UzTMK, but it must also enable its customers to comply with laws and regulations applicable to the customer's local jurisdiction, including Section 1502 of the U.S. Dodd-Frank Wall Street Reform and Consumer Protection Act, and the EU Conflict Minerals Regulation (EU 2017/821).

Management will also:

- support our customers by providing them with the information they request
- inform relevant teams whenever new versions of RMI reporting templates are released
- engage with suppliers to address and mitigate identified risk(s)
- reserve the right to terminate trading with suppliers who repeatedly refuse to align with this policy or provide the required information
- include mineral reporting activities within the Company's annual sustainability report

Employees

All Company employees should support transparency by accurately documenting supply chain information when requested.

Commercial Department and Quality Control Department should maintain systems to collect, store and collate the required supplier information to enable accurate mineral reporting. Individual customer requests requiring a CMRT, EMRT or other mineral-related

Company promptly, as supplier response times can be protracted, depending on the length of the supply chain.

3. Supplier Requirements

UzTMK suppliers are required to:

- Adopt a policy and management system consistent with this policy
- Carry out their own due diligence aligned with the OECD guidance
- Complete the RMI CMRT and EMRT as part of the supplier approval process, or upon request
- Provide any other mineral information required by our customers upon request e.g. minerals relating to tariffs or sanctions
- Work toward sourcing components or materials, which have a supply chain of minerals that originate only from smelters and refiners that have been audited and validated by industry programs such as RMAP
- Report any violations of this policy to UzTMK promptly and agree to enact any corrective actions
- 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.

4. Continuous Improvement

As with all sustainability, quality and compliance processes, UzTMK is committed to a continuous improvement approach in our mineral reporting due diligence processes, and the Company encourages our suppliers to improve their supply chain practices.

5. Accountability & Non-Compliance

Accurate and reliable information is of crucial importance, particularly in respect to UzTMK customers who have a legal duty to report on 3TG or other minerals. All Suppliers are accountable for the information they supply UzTMK, and they must ensure that submissions made to the Company are correct so that our Company documents, and information supplied to our customers, is complete and accurate.

Suppliers who put UzTMK at risk of non-compliance may be removed from the Company approved supplier list.

All stakeholders – employees, suppliers and customers, are encouraged to report any non-compliance promptly so that UzTMK can investigate and remediate any issues.

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 whistleblower 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.

7. 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.