

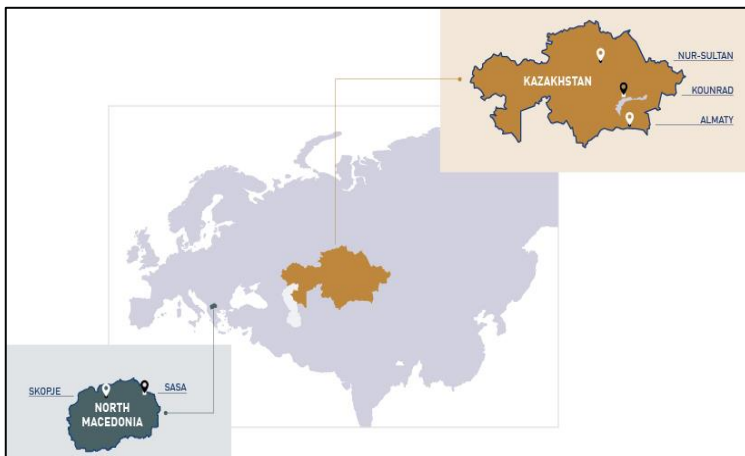
# CENTRAL ASIA METALS

(group, including Central Asia Metals PLC and all its subsidiaries, branches, joint ventures and associated businesses)

## MODERN SLAVERY STATEMENT

Central Asia Metals plc is a base metals producer with mining and processing operations in both Kazakhstan and North Macedonia with a gross annual revenue of \$235.2 million in 2021. In Kazakhstan, we operate an in-situ dump leach copper operation which through the SX-EW plant produces copper cathode and, in North Macedonia, we operate an underground zinc and lead mine which produces metal concentrate products that are sold to smelters for further treatment through our offtake partner. As an international business, we have a variety of local and international suppliers providing our subsidiaries with everything from equipment and diesel to maintenance, security, and logistics services. As such, we are mindful of the need for checks and measures along our supply chains to ensure we are tackling indentured servitude, child labour, and human trafficking within and tangential to our operations.

As a socially responsible company, we are aware of the human rights risks which are associated with working within the labour-intensive extractives industry across jurisdictions. Therefore, we are taking active steps, in line with the UN Guiding Principles, to help ensure that our business operations do not cause, contribute to, or are directly linked to human rights abuse anywhere in the world. Modern slavery, defined as slavery, servitude, or forced or compulsory labour is one of the most egregious violations of human rights and has no place within our business or in our modern world.



We understand that our license to operate, as well as our reputation, depends largely on our ability to conduct business sustainably, responsibly, and in line with our high standards and corporate values. Respect, particularly that of human rights, is a fundamental principle of our business and is a thread that runs through both our internal and outward facing policies. In order to demonstrate our values, we promote our Sustainability Policy at the forefront of what we do. This policy speaks to our commitment to fair labour practices, comprehensive risk management, and upholding human rights through an ethical supply chain. It guides our conduct both internally and through our engagement with suppliers, contractors, and relevant stakeholders. Our Sustainability Policy is underpinned by our Code of Conduct which echoes the need for treating not only our workers, but those along our supply chains, humanely and calling for violations, real or suspected, to be reported through our designated channels. Our Sustainability Policy is underpinned by our Code of Conduct which echoes the need for treating not only our workers but those along our supply chains humanely and calling for violations, real or suspected, to be reported through our designated channels.

Our Whistleblowing Policy, which includes an external hotline, is one such channel and its placement at strategic places on site ensures that not only employees, but contractors and third parties are able to alert us, confidentially, and without the fear of retribution. This past year and going forward, we have opened up our Whistleblowing Policy to new suppliers by including the contact link and details alongside our tendering documentation to prospective suppliers as well as publishing the information on our website.

As demonstrated by our recruitment of a Group Risk and Internal Controls Manager, we have sharpened our focus on risk management and evaluation of business risks, with ethical supply chains being at its core. Through an internal risk assessment, we have been able to better identify areas of risk, whilst noting potential areas for improvement. Whilst we have over 1,000 suppliers fulfilling our business needs, our local procurement goals of prioritising smaller, local businesses (2021: 41% at our Kazakhstan Sary-Kazna subsidiary and 57% at our Sasa operation), means that our direct supplier risk at present is assessed as medium to low when it comes up upstream purchasing. Our long-term partnership with a single off-take partner means our downstream sales are limited to a reputable business partner, minimising the potential risks of onward sales.

We have always conducted due diligence in line with normal business practices. However, we have taken a critical look at our sourcing and vetting processes in order to reinforce our due diligence practices. This past year we have developed a





Group Due Diligence Procedures Guide and rolled it out across our operations to ensure procurement teams have practical knowledge about how to identify red flags and escalate them via the most appropriate channels. Following the development of our Human Rights Policy in 2020, we have further rolled out the policy to those suppliers and contractors closest to our business, which include those who work on our premises. A risk assessment has been conducted to identify third-party facing employees (such as procurement, and sales teams) who would most benefit from enhanced human rights training. We are in the process of transitioning to an electronic learning system whereby those employees in high-risk roles will receive additional training through an on-line platform.

In furtherance of our goals, it was decided that all new suppliers and contractors should undergo a social assessment. Therefore, over the past year we have developed a questionnaire which tackles potential human rights impacts and requires information about each prospective supplier's working



conditions, workforce composition, human rights training, freedom of association and collective bargaining, provision of grievance mechanisms, and whistleblowing protections. Each new supplier (and our top 10 suppliers at each site) are assessed and evaluated by their answers to our questions. This is to ensure that our business partners, suppliers, and intermediaries have a full understanding of our policies, our stance on human rights and modern slavery, and our expectations of them going forward. We believe that this will promote supplier alignment with our values and standards when it comes to preventing human rights abuses and addressing impacts along our supply chain.

We are committed to ethical operating practices and work with companies which value integrity in their business dealings. This past year we have developed a Supplier Code of Conduct which summarises our policies and requires signature of compliance prior to our engagement of any such supplier. This will be sent to new suppliers as part of the tendering process. Whilst our suppliers are notified of our policies, we strongly believe in fostering bilateral communication on this topic. To further this goal, we send our top 30 suppliers (by expenditure) annual letters whereby we take the opportunity to inform them of the measures we took during the year within our own operations. We included a 'Call-to-Action' inviting each supplier to share their own policies and requested

additional information about their efforts or endeavours over the year. Finally, as a responsible business, we asked about their vision and proposed actions for 2022, offering our help and support to those suppliers looking to develop or implement comparable measures within their own business.

We are committed to not only implementing changes but also maintaining a great deal of involvement in order to track and measure meaningful progress. In order to do this, we have increased stewardship on the ground at site to further our insight into the effectiveness of our policies, their implementation, and to better identify emerging human rights risks. We have committed to conducting an internal human rights risk assessment on our business every three years whereby we identify, review, and report on the situation in the higher risk areas for our business. The first such human rights assessment is planned to take place over the course of 2022. Further, this coming year we will be undertaking at least two internal audits relating to suppliers and procurement. As a sign of our steadfast commitment to human rights and ethical supply chains, we have entrenched human rights into our Key Performance Indicators for our long-term incentive plans, meaning that all employees, including those at Board level, have a vested interest in attaining our goal of zero human rights abuses in our enterprise.

Given our continued focus on sustainability, CAML has spent 2021 making strides in improving processes and procedures relating to corporate governance and transparency in our supply chains. We will continue to find ways to ensure our suppliers, contractors, and business partners understand our expectations and hold values and principles similar to that of our own. We believe that, in taking these steps, we are doing our part to ensure that modern slavery is eliminated within our own business and those along our supply chains.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and relates to our actions and activities during the 2021 financial year and to 21 May 2022.



Nick Clarke  
Chairman  
Central Asia Metals Plc

This statement has been approved by Central Asia Metal plc's Board of Directors on 26 May 2022.

For more information on any of the policies mentioned in this statement, please follow these links:

- [Sustainability Policy](#)
- [Human Rights Policy](#)
- [Code of Conduct](#)
- [Whistle Blowing Policy](#)
- [Supplier Code of Conduct](#)