



## **CENTRAL ASIA METALS GROUP**

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

### **WHISTLE BLOWING POLICY**

#### **1. INTRODUCTION**

This document describes the Whistle Blowing Policy of Central Asia Metals Group and all its subsidiary companies worldwide and the measures and behaviours to be adhered to by all Central Asia Metals Group employees if they have concerns relating to a breach or potential breach of the corporate governance procedures, trade sanctions policy, anti-bribery policy or to any other actual or potential wrongdoing, malpractice or unethical behaviour by the company or someone else.

#### **2. KEY POLICY PRINCIPLES**

Central Asia Metals plc, under its Whistle Blowing Policy, provides all staff with a confidential way of raising concerns via an alternative route than through the hierarchy of the organisation.

We recognise that a person 'whistleblowing' is a witness and not a complainant and will be supported and protected against reprisals. Victimisation of an employee who has raised a concern, or any adverse treatment of an employee as a result of raising a concern, will not be tolerated and will be treated as a disciplinary offence.

#### **3. PROCEDURES**

If any of the employees becomes aware of any malpractice, they should report it immediately to their line manager. They should provide the line manager with any information or evidence they have. The line manager should formally notify the Group Compliance Officer of any malpractice complaint.

The General Counsel of Central Asia Metals plc will act as the Group Compliance Officer.

It will be the line manager's responsibility to initially investigate all matters reported to them promptly, confidentially and sensitively. The line manager should then provide a formal feedback to the employee and Group Compliance Officer of any investigation conducted and resulting actions taken. If any employee feels that the matter has not been resolved to the employee's satisfaction, the employee should raise their concern directly with the Group Compliance Officer.

We appreciate that there may be instances where employees will not feel comfortable in reporting a potential malpractice to their line manager. In these circumstances, employees are encouraged to raise any concerns directly to whichever of the following you prefer:

- Nigel Robinson, the Chief Executive Officer; or
- David Swan, the Chairman of the Audit Committee, or
- Alex Shapoval, Head of Treasury, with whom you may communicate in English or Russian.

Any of whom will then investigate the matter promptly, confidentially and sensitively. When contacting them, please state that you are doing so under the Whistleblowing Policy. They will provide a formal feedback to the employee and to the Audit Committee of the investigation and resulting actions taken.

#### 4. EXAMPLES

Below is a list of issues which may be reported under Whistle Blowing procedure. Please note that the list is not exhaustive and employees are relied upon to exercise their own judgement, initiative and common sense when they become aware of any potential malpractice:

- conduct which is an offence or a breach of law;
- the unauthorised use of Group's funds or resources;
- possible fraud, corruption or bribery, for example in contravention of the Group's Anti-Bribery Policy;
- instances of slavery or human trafficking in the Group's supply chains or within the Group;
- any violations of the Group's Trade Sanctions Policy;
- health and safety risks, including risks to the public as well as other employees;
- damage to the environment;
- deliberate non-adherence to the Groups' policies or procedures;
- sexual or physical abuse;
- showing undue favour over a contractual or employment matter;
- a person abusing their position for any unauthorised purpose or for personal gain;
- a person failing to meet appropriate professional standards; or
- deliberate concealment of information relating to any of the above.

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I confirm that I have read, understood and shall comply with the above policy document.

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**Name (block capitals)**

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**Signature**