

**POLICY OF THE MANAGEMENT OF UMP JSC FOR THE RESPONSIBLE
MINERALS SUPPLY CHAIN**

(to replace that as adopted at the Executive Management Board meeting dd. May 18, 2023,
Minutes No. 24/1386)

ULBA METALLURGICAL PLANT JOINT-STOCK COMPANY (hereinafter – UMP JSC) is a legal entity, which has got a full production cycle from processing of any kinds of tantalum and niobium raw materials up to production of finished goods.

Taking into account strict requirements of the world market to suppliers of products and services, and understanding the need to establish a legal and ethical minerals supply chain, UMP JSC purchases mineral resources from well-trying, reliable sources, with a guarantee of identification of each supplier and source of material, as well as obtaining sufficient documentation about origin and change of responsibility concerning the acquired minerals. When purchasing minerals UMP JSC follows the Directions of the Organization for Economic Cooperation and Development (OECD) on audit performances concerning responsible supply chains from areas captured by conflicts and regions of high risks (CAHRA) (hereinafter – OECD Guidance).

The management of UMP JSC is aware of risk of the negative consequences connected with extraction, sale and export of minerals from CAHRA and also realizes its duty to respect the human rights and responsibility for prevention of conflicts, and undertakes to adhere to the following principles in its activity:

1. To comply with the legislation of the Republic of Kazakhstan, international conventions and declarations in the field of social responsibility ratified by the Republic of Kazakhstan and also other normative documents, which do not allow for:
 - all forms of tortures, cruel, inhuman and degrading treatment;
 - all forms of forced or obligatory labor;
 - the worst forms of child labor;
 - other gross violations of human rights;
 - war crimes and other serious violations of international humanitarian law, crimes against humanity and genocide.
2. To avoid any support for non-state armed groups or their supporters and also public and private security services forces, which illegally control mines, transport routes and mining companies in delivery chain, collect taxes illegally or practice extortion.
3. Not to offer, not to promise and not to demand any bribes and also to refuse the offered bribes aimed at withholding or misrepresentation of information about minerals origin, misrepresentation of taxes, contributions and royalties paid to the government for mining, trade, circulation, transportation and export of minerals.
4. To cooperate with appropriate authorities and suppliers of minerals when identifying risk of illegal money legalization connected with mining, trade, circulation, transportation

or export of minerals, illegal taxes or extortion of minerals for the purpose of the risk prevention or reduction.

5. To demand from suppliers of minerals official documents serving as the proof of payment of taxes, contributions and royalties to the governments connected with mining, trade and export of minerals from CAHRA.

6. Adhere to due diligence steps described in the Supplement on Tin, Tantalum and Tungsten to the OECD Guidelines.

7. Support the implementation of the principles and criteria of the Extractive Industries Transparency Initiative (EITI) individually or through joint efforts and participate in relevant reporting, as well as comply with EITI requirements.

The management of UMP JSC expects from suppliers of minerals to adopt a similar Policy developed in accordance with Annex II of the OECD Guidance for their own supply chains or to strictly comply with the principles of the Policy of the management of UMP JSC for responsible minerals supply chain.

The management of UMP JSC intends to suspend or stop immediately work with the supplier who is suspected in commission and connection with any forms of contraventions of the accepted principles of the Policy of the management of UMP JSC for responsible minerals supply chain.

The Policy is publicly available and brought to attention of UMP JSC personnel, suppliers of tantalum raw materials and consumers of finished goods.

The management of UMP JSC undertakes the obligation to investigate each case of appeal concerning any forms of violations of the principles hereof. Appeals can be sent: on the official e-mail address mail@ulba.kz; 070005, the Republic of Kazakhstan, Ust-Kamenogorsk, 102 Abay avenue in writing or by fax: +7 (7232) 29 84 16.

The management of UMP JSC takes the responsibility for implementation of the Policy of the management of UMP JSC for responsible minerals supply chain and intends to follow its principles rigorously.

Executive Board Chairman



S. Bezhetskiy

Translated by

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