

# CENTRAL ASIA METALS

(GROUP, INCLUDING CENTRAL ASIA METALS PLC AND ALL ITS SUBSIDIARIES, BRANCHES, JOINT VENTURES AND ASSOCIATED BUSINESSES)

## WHISTLEBLOWING POLICY

### 1. ABOUT THIS POLICY

This document describes the Whistleblowing Policy of Central Asia Metals Group and all its subsidiary companies worldwide and provides guidance to its staff on the procedure for making protected disclosures. This can include 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.

The Company is committed to communicating the policy and any updates to employees through annual compliance engagement efforts as well as to on-site contractors. Further, the Company ensures that the policy is posted in public gathering areas across our sites as well as publicly available on our Company website.

### 2. KEY POLICY PRINCIPLES

The Company, through its Whistleblowing Policy, provides all staff with a confidential way of raising concerns through several routes, not just through the hierarchy of the organisation. The purpose of this policy is to give staff who have a genuine concern a method to report suspected wrongdoing in the knowledge that their concerns will be taken seriously, investigated promptly, and that their confidentiality will be respected. We recognise that a person 'whistleblowing' is a witness and not a complainant and will be supported and protected against retaliation. This policy aims to inform staff on how to raise a reasonable belief of wrongdoing and to reassure them that they can raise their reasonable beliefs without fear of reprisals. This is in line with our commitment to conduct our business with honesty and integrity in accordance with our Code of Conduct.

There are protections under applicable law and/or by our internal policies for a person who makes a complaint under the Whistleblowing Policy.

Victimisation, harassment, or obstruction of career progress, 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.



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### 3. METHODS

If our workers become aware of a legitimate concern, there are several routes available to them:

#### I. Line Manager

We hope that in many cases our people will feel comfortable raising a concern with their line manager. The complaint can be made in person or put in writing. The line manager may be able to agree a way of resolving the concern quickly and effectively.

#### II. Hotline

Alternatively, our workers can consult our independent hotline open 24/7 hosted by Navex Global Inc with designated numbers 0800 8 05 05 (Sasa) 0800 051 (Kounrad) and available through [cam.ethics.com](http://cam.ethics.com). The hotline is available in several languages including English, Russian, and Macedonian.

#### III. Alternative options

If a worker is uncertain whether something is within the scope of the policy, he or she can seek advice from their respective line manager. However, we appreciate that there may be instances where employees will not feel comfortable asking about or reporting a potential malpractice to their line manager or through the external hotline. In these circumstances, employees are encouraged to raise any concerns directly to whomever of the following they prefer:

- Nigel Robinson, the Chief Executive Officer; or
- David Swan, the Chairman of the Audit Committee, or
- Victoria Usova, Legal Counsel with whom they may communicate in Russian, or
- Ivica Talevski, the Sasa Mine Deputy General Director and Sustainability Director with whom they may communicate in Macedonian.

Contact details of the above are made available internally to staff and accompany this policy, which is made available in local languages.

### 4. CONFIDENTIALITY

When voicing a concern by any of the above routes, as much relevant information and evidence as possible should be provided during the conversation. We hope that our staff will be able to voice whistleblowing concerns openly under this policy. However, if someone wants to raise a concern confidentially, we will make every effort to keep their identity secret.

Although staff can make complaints anonymously, proper investigations and follow-up may be more difficult or impossible if we cannot obtain further information from the whistleblower.



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## 5. INVESTIGATION AND OUTCOME

When making a complaint, workers should state that they are doing so under the Whistleblowing Policy. Once a complaint is made through any of the methods provided above, the Company will carry out an initial assessment to determine the scope of an investigation. Reported matters will be investigated promptly, confidentially and sensitively. The Legal Counsel may be notified of the complaint and any relevant information. The Legal Counsel will in turn provide formal feedback to the Audit Committee of the investigation and actions taken as well as the number and types of misconduct reported.

The Company aims to, within a reasonable timeframe, provide feedback to the employee of the outcome of the investigation, which is why it is preferable that complaints are made confidentially rather than anonymously.

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 Legal Counsel.

If we conclude from our assessment and investigations that a whistleblower has made false allegations maliciously, this will be taken seriously, and the whistleblower may be subject to disciplinary action.

## 6. FURTHER INFORMATION

This policy does not form part of any employee's contract of employment and Company may amend it at any time. This policy should not be used for complaints relating to a worker's own personal circumstances, such as the way that a worker has been treated at work. For such cases, employees should refer to the Code of Conduct and can make a complaint internally through their Human Resources manager.

Below is a list of issues which may be reported under Whistleblowing procedure. Please note that the list is not exhaustive, and employees are expected to rely upon and exercise their own judgement, initiative and common sense when they become aware of any potential malpractice, as outlined within the relevant Company training:

- 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;

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- 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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