REDACTED, REDACTED: LME Red Flag Assessment Template-Track C

1 BRAND INFORMATION

BRAND NAME	Pb REDACTED 99.99%	LME BRAND CODE	REDACTED9999
	Pb REDACTED 99.97%		REDACTED9997
	Zn REDACTED 99.995%		REDACTED995
LME PRODUCER NAME	REDACTED	PRODUCER ADRESS	REDACTED
CONTACT DETAILS		City	REDACTED
Job Title	CEO REDACTED	Street	REDACTED
Name	REDACTED		
web site	REDACTED		
person submitting RFA	REDACTED		
Job Title	REDACTED		
Phone number	REDACTED		
e-mail adress	REDACTED		
DATE OF SUBMISSION	30.06.2025	REPORTING PERIOD	
update with information		start date	01.01.2024
		end date	31.12.2024

2 COMPANY MANAGEMENT SYSTEM

a Is there a company Supply chain due diligence policy?

REDACTED has a Supply Chain Policy available at

https://www.REDACTED/files/certificates/REDACTED/Supply_Chain_Policy_en.pdf

b Describe how this policy been communicated to suppliers, employees, and the public.

REDACTED Responsible sourcing policy is brought to the knowledge of our suppliers. The policy is available on the company's corporate web site and on the internal web site.

c Explain the management structure responsible for the Producer's due diligence, including who is directly responsible for implementing the supply chain due diligence policy.

The business structure is available at REDACTED web site - where REDACTED is the non-ferrous producer, REDACTED is the exclusive trade company for the full output of REDACTED, REDACTED is the Managing company with Legal and Corporate compliance department.

REDACTED is authorized to act on behalf and for account of REDACTED; to supervise the administration and execution of the signed commercial transactions. REDACTED is in charge with negotiating, concluding, implementing and reporting on the purchases of raw material and sales of the final products.

REDACTED performs the RS due diligence as possessing all primary information and documents related to the purchases (sales) and is the only one that is in direct contact with suppliers and customers.

REDACTED has an available up-to date Responsible Sourcing Due Diligence working procedure with working group including a legal advisor of the group. The responsible person is REDACTED

The results of Responsible sourcing due diligence are reported to: CEO REDACTED; REDACTED Executive Director; REDACTED General Manager.

d Describe the system of controls and transparency over the mineral supply chain put in place by the Producer.

a. the type of information the Producer collects from suppliers

Due to the specifics of the production processes (both for zinc and lead) with the start of the negotiations for the supply of any kind of material the following information is required from every specific supplier: type of material, quality/analysis; origin of the material; quantity; delivery period and delivery terms. A signed supply contract is available and kept on paper and as well as on server as pdf.

The following documents are required for completing the delivery dossier and are kept in original: transport documents CMR 8 CIM & B/L; certificate of analysis and weight; invoice; import custom declaration (if needed); certificate of origin (if needed); EUR 1 and T2L; insurance policy; producer's Material Safety data sheet (MSDS). All shipping documents on paper are kept in REDACTED as they are needed for their operational work.

At least once per year all suppliers are required to fulfil a Responsible sourcing self-assessment questionnaire, including information of type of material, origin of material, transit countries, EITI transparency as well as questions on Environmental, Social, and Governance (ESG), certificates and etc.

b. whether this information is required in commercial contracts with suppliers

The information from 2 d.a. is incorporated in the signed by both parties' contracts

c. the format of the record-keeping of the Producer (such as paper-based, computerised, digital leger technology, or part of an institutionalised mechanism)

We have 2 ways of record keeping- obligatory on paper and the same in electronic format (incl. but not limited to pdf, docs, excel) on a company server with regular back up.

Both REDACTED and REDACTED work on one and the same secured server. REDACTED collect the information (including for the scope of RS) and it is stored on REDACTED server.

d. for how long this information is stored

The retention period for documents in REDACTED varies depending on their type and the relevant legislation. For example, payroll records are kept for 50 years, and accounting registers - 10 years. Documents related to tax control are kept for 5 years after the expiration of the statute of limitations for the repayment of the public obligation.

We keep /incl. on paper/ all-important trade database and documents more than 25 years.

e. Describe the data the management system has yielded this Reporting Period and how it has strengthened the company's due diligence efforts

The origin of the material and location as mine name or/and quality is stated in the initial offer, then in the signed contract and as well as in the accompanying shipping documents. Based on origin of the material, the agreed monthly volumes and delivery periods as well as the agreed delivery terms according to the applied Incoterms 2020 /stated in the contract/, we can easily monitor the movement and delivery process.

The control is permanent and continuous as we collect all initial and original documents in order to fully comply with the laws and regulations concerning REDACTED activities.

At least once per year we update our supplier's data base including but not limited to the following topics- update on company information; company management systems and certifications; corporate and social responsibility; AML-CFT policies and procedure; record keeping systems; sustainability reports.

f. Confirm that a company-level or industry-wide grievance mechanism has been established and provide evidence

There is a company grievance channel, available at our web site: REDACTED

We are committed to a culture where everyone feels empowered to speak openly and raise concerns securely and confidentially about things that don't feel right without fear of retaliation.

g. Describe the Producer's method for identifying Conflict-Affected and High-Risk Areas ("CAHRA").

Irrespective of whether the mineral is sourced directly from the mine or through a trader, the origin and/or name and/or location of the material is stated in the contract as well as in the accompanying shipping documents. The supplier cannot change the location/origin of the mineral after a contract is signed.

During the whole process we keep awareness of the origin of the material. In case of a change in the situation (related with CAHRA) we are notified primarily from the supplier/source and a management decision is taken how to proceed further.

REDACTED prepare and report to REDACTED Legal advisor a register with the name of the supplier, the type of supplied material, the exact location of the source, whether a document accompanying the delivery is available proving the country of origin /as state of the country of origin in the contract, certificate of origin, ATP, EURO 1 certificate, customs declaration, etc./. The legal advisor check the CAHRA status and sign the register.

As part of the process, we use at least 3 credible sources to identify whether the supplied material originates or transits trough "CAHRA". The main source is the

(Republic of REDACTED) National Revenue Agency official web site https://nra.bg/wps/portal/nra/registers-i-spisuci/Spisuci/spisuk.visokoriskovi.durjavi.ZMIP where is stated:

In accordance with Article 46 of the Anti-Money Laundering Measures Act (AMLA), countries that do not apply or incompletely apply international standards in combating money laundering and terrorist financing are those designated by the European Commission as high-risk third countries.

When implementing measures against money laundering and terrorist financing, persons obliged under the AML/CFT Act should take into account following categories of lists of high-risk third countries:

- European Commission lists of high-risk third countries; last update 07.02.2024

https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A02016R1675-20220313

• FATF lists (updated three times a year, during February, June and October)

https://www.fatf-gafi.org/en/publications/High-risk-and-other-monitored-jurisdictions/Call-for-action-february-2025.html

• EU list of non-cooperative jurisdictions for tax purposes (updated twice a year; during February and October)

https://www.consilium.europa.eu/en/policies/eu-list-of-non-cooperative-jurisdictions/

For reference we also use the regularly updated (on quarterly basis) list of conflict-affected and high-risk areas (CAHRAs) (as defined under Regulation 2017/821) https://www.cahraslist.net/cahras

According to the accepted Responsible Sourcing Due Diligence working procedure in case in 2 of 3 sources the country of origin or transit do not fall under the list of CAHRA, REDACTED accepts this country source is considered out of reach of this subject.

The verification is done at least twice per year- in most cases beginning, mid and end of the reporting period. For our report we used for verification all a.m. 4 sources.

A register is available with the dates of verification. For the reporting period this is done on 24.01.2024; 12.07.2024 and oct-Dec 2024.

The results of the risk identifying process is reported to the Management. In case any risk is identified the principle of the Supply chain policy will be applied.

3 LOCATIONS OF MINERAL ORIGIN AND TRANSIT- separate sheet

4 SUPPLIERS RED FLAG EVALUATION- separate sheet

5 RED FLAG ASSESSMENT

RFA Evaluation questions	Answer with Yes or No

a. Is there any Input Material for the LME Brand where the origin is unable to be determined?		No
b. Do any of the countries identified in Section 3 LOCATION OF MINERAL ORIGIN AND TRANSIT EVALUATION fall into the CAHRA areas identified in 3.d?		No
c. Do any of the source countries identified in Section 3 LOCATION OF MINERAL ORIGIN AND TRANSIT EVALUATION receive a quantity of material that is out of keeping with the source country's known reserves and expected production levels as answered in 3.e?		No
d. Do any of the countries identified in Section 3 LOCATION OF MINERAL ORIGIN AND TRANSIT EVALUATION fall into the list of countries known to transit materials from CAHRAs identified in 3.f?		No
e. Do any of the countries identified in Section 4. SUPPLIER RED FLAG EVALUATION fall into the CAHRA areas identified in 4.c without confirmation provided in 4.d?		No
f. "Is the answer to any of Section 5.a – 5.e positive? If yes, the LME Brand is considered to have raised an OECD Red Flag and must use Track A."		No
g Does the Producer fail to identify the EITI status of any of the source countries identified in Section 3 LOCATION OF MINERAL ORIGIN AND TRANSIT EVALUATION in 3.g.(i)?		No
h Does the Producer fail to provide supplier’s EITI disclosure information described in 3.g.(ii) for suppliers located in EITI implementing countries?		No

	Country identification			Red Flag 1	Red Flag 2	Red Flag 3	EITI Implementation			
Question from RFA	**3.a. On the basis of the Producer's Company Management Systems for tracing the transit of materials from its operations and those of its suppliers, list all countries from which the minerals used for this Brand originated and transited through during the Reporting Period.**	**3.b. Identify whether each of the countries listed in (a.) is a source for the Brand material or a country through which the material only transits.**	**3.c. Specify the type of material being sourced or transited. This is optional to disclose and only requested to assist in answering the remaining questions.**	**3.d. Classify each country's Conflict-Affected or High-Risk Area ("CAHRA") status.**	**3.e. For each of the source countries identified, assess if the volume of mineral the Producer sourced during the Reporting Period is in keeping with the source country's known reserves and expected production levels. Provide the result of your assessment.**	**3.f. For each of the countries identified, assess if this country known to transit materials from CAHRAs.**	**3.g. For each of the source countries in (b.), assess the status of the supplier's Extractive Industry Transparency Initiative ("EITI") implementation following these steps**			**Additional comments**
Clarification of required answers	Please enter the country name.	Please enter "Source" or "transit only".	Optional: you may enter the type of material sourced if desired.	Please enter country CAHRA evaluation as "No CAHRAs", "Some CAHRAs", or "All CAHRA". For "Some CAHRAs", provide specific region in comments column K.	For source countries only: Please enter Yes or No for source countries and NA for transit only countries.	For all countries: Please enter Yes if known to transit materials from CAHRAs or No if not.	For source countries only: (i) State whether or not the country is an EITI-implementing country. Please enter Yes or No for source countries and NA (Not Applicable) for transit only countries.	For source countries only: (ii) If the supplier is located in an EITI-implementing country, identify if the supplier is in compliance with the EITI reporting requirements of that country. Provide links to the relevant company's submission for the purpose of EITI reporting, where such a disclosure does not reveal commercially sensitive information.	For source countries only: (iii) If the country is not an EITI-implementing country, identify if the supplier takes other steps to provide transparency on payments to governments and other matters in line with the aims of EITI. Provide link(s) to disclosures where available.	
Example answers	*Country A*	*Source*	*Copper concentrate*	*No CAHRAs*	*Yes*	*No*	*Yes*	*Not in compliance*	*NA*	
	Country B	*Source*	*Alumina*	*Some CAHRAs*	*No*	*No*	*Yes*	*In compliance, report here: (link)*	*NA*	*Region ABC in Country B is considered a CAHRA and the materials we source do not come from this region.*
	Country C	*Transit only*	*Zinc oxide*	*All CAHRA*	*NA*	*Yes*	*NA*	*NA*	*NA*	
	Country D	*Source*	*Bauxite*	*No CAHRAs*	*Yes*	*No*	*NA*	*NA*	*Reporting on payments to governments on page XX (link)*	
Supplier 1	North Macedonia	Source	lead concentrate	No CAHRAs	yes	no	no		The supplier is a trader, does not mine or produce any material. The Supplier has a global compliance program in place and Responsible sourcing policy statment (www.REDACTED.com/esg) and the FCPA clause in their commercial contracts.	
Supplier 2	Kosovo	Source	lead concentrate	No CAHRAs	yes	no	no		The mine make payments of a variaty of taxes to the tax authority and Ministry of REDACTED. This includes mining concession royalties as per law	
	Serbia	Transit only	lead concentrate	No CAHRAs	NA	no	NA	NA	NA	
Supplier 3	North Macedonia	Source	lead concentrate	No CAHRAs	yes	no	no		The supplier pays mine concession fees to Government of Republic of REDACTED and reports to Ministry of Economy and Municipalities	
Supplier 4	REDACTED	Source	lead concentrate	No CAHRAs	yes	no	no		concession fee, available in the audited financial according to BG law an on https://www.me.government.REDACTED/themes/koncesii-za-dobiv-735-1613.html	
Supplier 5	REDACTED	Source	lead concentrate	No CAHRAs	yes	no	no		concession fees are paid by the mine to the Ministry of Energy on https://www.me.government.REDACTED/themes/koncesii-za-dobiv-735-1613.html	
Supplier 6	REDACTED	Source	lead concentrate	No CAHRAs	yes	no	no		concession fees are paid by the mine to the Ministry of Energy on https://www.me.government.REDACTED/themes/koncesii-za-dobiv-735-1613.html	

Question from RFA	4.a. Indicate where the Relevant Companies have operated in or sourced minerals during the Reporting Period.	4.b. Classify the locations provided in (a.) into either locations where no minerals are produced (such as headquarters, offices, or holding companies) or locations where minerals are produced.	4.c. Classify each country's Conflict-Affected or High-Risk Area ("CAHRA") status.	4.d. If any CAHRAs are identified, provide confirmation that the Producer has secured evidence that the origin or transit of the material entering their feedstock was not sourced from the CAHRA that raised the OECD supplier red flag and that the Relevant Company has strong company-wide due diligence management systems.
Clarification of required answers	Please enter the country name.	Please enter "No Mineral Production" or "Mineral Production"	Please enter country CAHRA evaluation as "No CAHRAs", "Some CAHRAs", or "All CAHRA".	
Example answers	*Country X*	*No Mineral Production*	*No CAHRAs*	
	Country Y	*No Mineral Production*	*Some CAHRAs*	*[Confirmation needed]*
	Country Z	*Mineral Production*	*All CAHRA*	*[Confirmation needed]*
Supplier 1	Switzerland	No Mineral Production	No CAHRAs	
Supplier 2	Switzerland	No Mineral Production	No CAHRAs	
Supplier 3	Luxembourg	No Mineral Production	No CAHRAs	
Supplier 4	Singapure	No Mineral Production	No CAHRAs	
Supplier 5	Serbia	No Mineral Production	No CAHRAs	
Supplier 6	Turkey	Mineral Production	No CAHRAs	
Supplier 7	North Macedonia	Mineral Production	No CAHRAs	
Supplier 8	Kosovo	Mineral Production	No CAHRAs	
Supplier 9	Switzerland	No Mineral Production	No CAHRAs	
Supplier 10	REDACTED	Mineral Production	No CAHRAs	
Supplier 11	REDACTED	Mineral Production	No CAHRAs	
Supplier 12	REDACTED	Mineral Production	No CAHRAs	

	Country identification			Red Flag 1	Red Flag 2	Red Flag 3	EITI Implementation				
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Clarification of required answers	Please enter the country name.	Please enter "Source" or "transit only".	Optional: you may enter the type of material sourced if desired.	Please enter country CAHRA evaluation as "No CAHRAs", "Some CAHRAs", or "All CAHRA". For "Some CAHRAs", provide specific region in comments column K.	For source countries only: Please enter Yes or No for source countries and NA for transit only countries.	For all countries: Please enter Yes if known to transit materials from CAHRAs or No if not.	For source countries only: (i) State whether or not the country is an EITI-implementing country. Please enter Yes or No for source countries and NA (Not Applicable) for transit only countries.	For source countries only: (ii) If the supplier is located in an EITI-implementing country, identify if the supplier is in compliance with the EITI reporting requirements of that country. Provide links to the relevant company's submission for the purpose of EITI reporting, where such a disclosure does not reveal commercially sensitive information.	For source countries only: (iii) If the country is not an EITI-implementing country, identify if the supplier takes other steps to provide transparency on payments to governments and other matters in line with the aims of EITI. Provide link(s) to disclosures where available.		
Example answers	*Country A*	*Source*	*Copper concentrate*	*No CAHRAs*	*Yes*	*No*	*Yes*	*Not in compliance*	*NA*		
	Country B	*Source*	*Alumina*	*Some CAHRAs*	*No*	*No*	*Yes*	*In compliance, report here: (link)*	*NA*	*Region ABC in Country B is considered a CAHRA and the materials we source do not come from this region.*	
	Country C	*Transit only*	*Zinc oxide*	*All CAHRA*	*NA*	*Yes*	*NA*	*NA*	*NA*		
	Country D	*Source*	*Bauxite*	*No CAHRAs*	*Yes*	*No*	*No*	*NA*	*Reporting on payments to governments on page XX (link)*		
Supplier 1	Greece	Source	zinc concentrate	No CAHRAs	yes	no	no			Greece is not EITI. As part of its dedication to transparency and accountability, the supplier has established a set of codes and policies that secure transparency in government payments, such as Antibribery and Corruption Policy, Code of Ethics and Business Conduct & Whistleblowing Reporting System. Moreover, payment of royalties in the Greek State is conducted according to respective Greek legislation which provides in detail the calculation formula and method of annual payment of these royalties.	
Supplier 2	Turkey	Source	zinc concentrate	No CAHRAs	yes	no	no			Eventough Turkey is not an EITI-implementing country, all the mine producers must declare their annual production to MAPEG (General Directorate of Mining and Petroleum Affairs)	
	Peru	Source	zinc concentrate	No CAHRAs	yes	no	no			http:/REDACTED.com.pe/sustenbilidad	
	Colombia	Transit only	zinc concentrate	No CAHRAs	NA	no	NA	NA		NA	
	Italy	Transit only	zinc concentrate	No CAHRAs	NA	no	NA	NA		NA	
	Spain	Transit only	zinc concentrate	No CAHRAs	NA	no	NA	NA		NA	
Supplier 3	North Macedonia	Source	zinc concentrate	No CAHRAs	yes	no	no			REDACTED is a trader, does not mine or produce any material. REDACTED has a global compliance program in place incl Responsible sourcing policy statment (www. REDACTED.com/esg) and the FCPA clause in our commercial contracts.	
	Turkey	Source	zinc concentrate	No CAHRAs	yes	no	no				
	Peru	Source	zinc concentrate	No CAHRAs	yes	no	no				
	Colombia	Transit only	zinc concentrate	No CAHRAs	NA	no	NA	NA		NA	
	Italy	Transit only	zinc concentrate	No CAHRAs	NA	no	NA	NA		NA	
	Spain	Transit only	zinc concentrate	No CAHRAs	NA	no	NA	NA		NA	
Supplier 4	Morocco	Source	zinc concentrate	No CAHRAs	yes	no- The material was shipped onboard the bulk vessel Zeliha K, which had been chartered for this cargo/ voyage only. To the best of supplier's knowledge, there was no transhipment / stop port between Morocco and REDACTED.	no			https://www.REDACTED.com/en/investisseurs	
Supplier 5	Serbia	Source	zinc concentrate	No CAHRAs	yes	no	no			We adhere to and comply with the applicable laws and regulations of the Republic ofREDACTED, including royalties, permitting concession, transperency on payments requirements.	
Supplier 6	Turkey	Source	zinc concentrate	No CAHRAs	yes	no	no			Eventough Turkey is not an EITI-implementing country, all the mine producers must declare their annual production to MAPEG (General Directorate of Mining and Petroleum Affairs)	
Supplier 7	North Macedonia	Source	zinc concentrate	No CAHRAs	yes	no	no			The Supplier pays mine concession fees to Government of republic of REDACTED and reports to Ministry of Economy and Municipalities	
Supplier 8	Kosovo	Source	zinc concentrate	No CAHRAs	yes	no	no			Mining rent paid in accordance with Law	
	Serbia	Transit only	zinc concentrate	No CAHRAs	NA	no	no	NA		NA	
Supplier 9	Turkey	Source	zinc concentrate	No CAHRAs	yes	no	no			Turkey & Mexico-The Supplier sent a reply -We assure you that all our sourcing is conducted aligned with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas, which should provide enough comfort on the responsible sourcing of the material provided to you. https://www.REDACTED.com/sustainability	
	Mexico	Source	zinc concentrate	No CAHRAs	yes	no	no				
	Malta	Transit only	zinc concentrate	No CAHRAs	NA	no	NA	NA		NA	
	Turkey	Transit only	zinc concentrate	No CAHRAs	NA	no	NA	NA		NA	
Supplier 10	REDACTED	Source	zinc concentrate	No CAHRAs	yes	no	no			concession fees are paid by the mine to the Ministry of Energy on https://www.me.government.REDACTED/REDACTED/themes/koncesii-za-dobiv-735-1613.html available in the audited financials	
Supplier 11	REDACTED	Source	zinc concentrate	No CAHRAs	yes	no	no			concession fees are paid by the mine to the Ministry of Energy on https://www.me.government.REDACTED/REDACTED/themes/koncesii-za-dobiv-735-1613.html available in the audited financials	
Supplier 12	REDACTED	Source	zinc concentrate	No CAHRAs	yes	no	no			concession fees are paid by the mine to the Ministry of Energy on https://www.me.government.REDACTED/REDACTED/themes/koncesii-za-dobiv-735-1613.html available in the audited financials	

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Supplier 11	REDACTED	Mineral Production	No CAHRAs	
Supplier 12	REDACTED	Mineral Production	No CAHRAs	