

Kazzinc Ltd. – Public Responsible Supply
Chain Due Diligence Report
UPDATED

**Kazzinc Ltd. – Public Responsible Supply Chain
Due Diligence report**

Kazzinc Ltd. – Public Responsible Supply Chain Due Diligence Report

Contents

<i>Kazzinc Ltd.</i> - Public Responsible Supply Chain Due Diligence Report.....	3
1 Company information.....	3
2 Third-party assessment summary	4
3 Responsible Sourcing Programme	5
4 Management system	7
4.1 Management structure	7
4.2 Internal systems of control.....	8
4.3 Record keeping system	11
5 Risk identification.....	12
5.1 Our approach	12
5.2 Risk identification – results.....	14
6 Risk mitigation.....	15
7 Extractive Industry Transparency Initiative	15
8 Kazzinc management conclusion.....	16

Kazzinc Ltd. – Public Responsible Supply Chain Due Diligence report

Kazzinc Ltd. - Public Responsible Supply Chain Due Diligence Report

This combined London Bullion Market Association (LBMA) Refiners Compliance Report and OECD Due Diligence Guidance Step 5 Report summarises how Kazzinc Ltd., as an LBMA Good Delivery Refiner of silver and gold and as an London Metal Exchange (LME) brand producer of lead, has complied with the requirements of the LBMA Responsible Silver Guidance, Version 2 (Responsible Silver Guidance) and LBMA Responsible Gold Guidance, Version 9 (Responsible Gold Guidance) and the brand compliance requirements defined in the LME Policy on Responsible Sourcing of LME-Listed Brands, version 2023 for the year ending 31 December 2024 (Report).

The LBMA Guidance for Good Delivery Refiners established standards of due diligence that aim to combat systematic or widespread abuses of human rights, avoid contributing to conflict, and comply with anti-money laundering and combating terrorist financing regulations.

The LME Responsible Sourcing Policy requires LME brand producers to implement the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (CAHRAs) (3rd edition) (OECD DDG).

This Step 5 Report further summarises how Kazzinc Ltd. has implemented the OECD DDG for all by-products of the LME and LBMA brands production processes.

Date of the Report: 31 March 2025 (updated Group links: 25.07.2025)

Responsible for this report: Zhanbotin Zhanat (Chief Executive Officer) and Kassymova Madina (Chief Compliance and Business ethics Officer).

Public location of this Report: <https://www.kazzinc.com/eng/o-proizvodstve>

1 Company information

Company Name	Kazzinc Ltd. (Kazzinc)
Company location	1 Promyshlennaya Street, Ust-Kamenogorsk, East Kazakhstan region, Kazakhstan, 070002 49.97967860419984, 82.61780233351311
Description of industrial asset	Kazzinc is an integrated zinc producer with a large share of associated copper, gold, silver, zinc and lead output. The Company’s core operations are located in the Akmola, Ulytau and East-Kazakhstan regions. All Kazzinc industrial sites, including auxiliary operations, are part of a single integrated production chain. Feedstock from mines and open pits are pre-processed at processing plant before being delivered to metallurgical complexes for the production of high-quality finished

**Kazzinc Ltd. – Public Responsible Supply Chain
Due Diligence report**

	<p>products, while a portion of the concentrates produced by Kazzinc or its subsidiaries are being sold directly to third parties.</p> <p>Third-party feed processed by Kazzinc is purchased either via Glencore’s marketing offices or directly by Kazzinc.</p> <p>Kazzinc has been on the LBMA Good Delivery list for gold and silver since 1996 and has been the producer of the LME lead brand ‘YK’ since 2002.</p> <p>Kazzinc has an annual lead production capacity of approximately 150,000 metric tons.</p> <p>For more info visit the web site: https://www.kazzinc.com/</p>
Metal/mineral material produced	Gold, silver and lead
Type of operation	Mining, smelting and refining
Ownership structure, including any subsidiaries	Glencore plc indirectly holds 69.7% of Kazzinc, and the breakdown of the remaining shareholdings can be found here .
Time period covered by this report	1 January 2024 – 31 December 2024

2 Third-party assessment summary

Date of last assessment	<p>Kazzinc has been successfully assessed by the Copper Mark against the Joint Due Diligence Standard for Copper, Lead, Molybdenum, Nickel, and Zinc (JDDS) in 2023 and by the LME under Track A (on full year 2023 information).</p> <p>Kazzinc was successfully assessed against the Responsible Gold and Silver Guidance, in April 2024, upon which Kazzinc’s standing as a Good Delivery Refiner for Gold and Silver was renewed. The assessment covered the period from 1 January 2023 to 31 December 2023.</p> <p>The reports have been independently assured by an approved Assurance Provider and are available on Kazzinc’s official website.</p>
URL to most recent assessment summary or assurance report	https://www.kazzinc.com/eng/proizvodstvennye-otchyoty-kompanii

**Kazzinc Ltd. – Public Responsible Supply Chain
Due Diligence report**

Re-assessment due date	LME: 2026. LBMA Good Delivery: Annually
Assessment period for the third-party assessment	1 January 2024 – 31 December 2024
Materials in scope of the third-party assessment	Gold ingot Silver ingot
Assessment firm for the third-party assessment	BDO Qazaqstan LLP, an audit firm accredited by the LBMA and approved by LME and the Copper Mark.

3 Responsible Sourcing Programme

Glencore recognises the imperative of responsible sourcing and supplying metals and minerals that advance everyday life. Our Responsible Sourcing Programme is our approach to incorporate social, ethical, and environmental considerations in the production of our products, throughout our supply chains and when managing relationships with our suppliers. We expect our suppliers to share our commitment to ethical, safe, and responsible business practices in line with our Purpose and Values.

Our [Responsible Sourcing Policy](#) (Policy) applies across the entire Glencore Group and outlines our commitments, approach, and requirements for responsibly sourcing goods, services, metals and minerals. The Policy is aligned with the OECD DDG when sourcing metals and minerals and is supported by a comprehensive Group Policy framework.

Glencore’s [Supplier Code of Conduct](#) (Supplier Code) outlines our requirements and expectations for suppliers and aligns with the OECD DDG’s Annex II standards for responsible sourcing of metals and minerals. It is shared with relevant stakeholders (suppliers, employees, etc.) and is available on Glencore’s website.

Our Responsible Sourcing Standard (Standard), which is implemented across our marketing offices and industrial assets, sets mandatory requirements for commodity departments to identify, assess and manage the key responsible sourcing risks related to suppliers of our goods, services, metals and minerals.

Our Supply Chain Due Diligence Procedure – Metals and Minerals (SCDD Procedure) provides a comprehensive framework for implementing steps 2 and 3 of the OECD DDG. It supports the identification, assessment, and management of risks in our supply chain, and in alignment with the requirements of our Responsible Sourcing Programme. As part of our commitment to continuous

**Kazzinc Ltd. – Public Responsible Supply Chain
Due Diligence report**

improvement aiming to strengthen our approach to responsible sourcing, in Q4/2024, the GRST commenced a process to enhance the SCDD Procedure by incorporating lessons learned since the inception of our Responsible Sourcing Programme. Key updates to the SCDD Procedure include a more comprehensive and refined SCDD process, and formalisation of site visits and on-the-ground assessments as integral components of our risk identification and mitigation strategy. The updated SCDD Procedure is being rolled out during 2025. The Policy, the Supplier Code, the Standard and the SCDD Procedure apply to all employees, directors and officers, as well as contractors under Glencore's direct supervision, working for any Glencore-controlled office or industrial asset worldwide.

Our Responsible Sourcing Programme is managed by Group Sustainability and is integrated within a broader set of policies, standards and procedures that guide the implementation of responsible practices and the controls needed for risk mitigation and compliance. Supporting documents include materials from Group Compliance, Corporate Affairs, Finance, Human Resources, Legal and Industrial Risk Management. These policies and their underlying materials set out our approach and commitment to operate responsibly, transparently and in line with our Values and our Code. See also: <https://www.glencore.com/who-we-are/policies>.

We are committed to understanding and addressing human, social and labour rights violations, governance risks, and environmental impacts in our supply chains. Through our policies, standards and processes, including our Responsible Sourcing Policy and Supplier Code, we promote respect for human rights in accordance with the United Nations Guiding Principles on Business and Human Rights, the United Nations Universal Declaration of Human Rights, the International Labour Organization's Declaration on Fundamental Principles and Rights at Work, and the UN Global Compact. Through these mechanisms, our operations are required to respect and promote human rights across all our activities.

In compliance with Glencore's Responsible Sourcing Programme, which emphasises ethical, safe, and responsible business practices in line with Glencore's Purpose and Values, Kazzinc has taken steps to ensure its procedures and practices reflect these commitments. Glencore's policy framework applies to and is further implemented by Kazzinc through the [Responsible Supply Chain Practice for Metals and Minerals](#) (the Kazzinc Procedure for Policy Implementation), the [Kazzinc Supplier Code of Conduct](#) (Kazzinc Supplier Code) and Procedure for Responsible Practice in Supply Chains - Metals and Minerals (Kazzinc Manual) since 2022.

The Kazzinc Procedure for Policy Implementation is a publicly available document outlining Kazzinc's commitments related to the supply chain of metals and minerals. It applies to all employees, managers, and company officials, as well as contractors directly managed by Kazzinc. Additionally, it defines the specific requirements for our suppliers of metals and minerals. The Kazzinc Manual complements the Kazzinc Supplier Code and Kazzinc Procedure for Policy Implementation by detailing the necessary actions for supplier due diligence. This includes data collection, risk assessment, risk mitigation, ongoing monitoring up to disengagement, and data storage processes at Kazzinc.

**Kazzinc Ltd. – Public Responsible Supply Chain
Due Diligence report**

During the reporting year, Kazzinc continued to implement other Glencore policies and related Kazzinc guidance documents, which support the responsible sourcing implementation at Kazzinc. These include:

- Anti-Money Laundering Policy;
- Anti-Bribery and Corruption Policy;
- Conflict of interest Policy;
- Applicable Sanctions Compliance Policy;
- Human Rights Policy;
- Whistleblowing Policy;
- Sanctions Screening Guidance.

4 Management system

4.1 Management structure

The Group Responsible Sourcing team (GRST), which reports to Glencore’s Head of Sustainability, manages Glencore’s responsible sourcing programme for metals, minerals, goods and services. It supports our marketing offices and industrial assets implementing the Responsible Sourcing Programme.

The GRST undertakes a risk-based assessment of potential and current suppliers, with findings informing a tailored risk management process aligned, for metals and minerals, with the five-step due diligence framework outlined in Annex I of the OECD DDG.

When high risks are identified, the GRST may recommend business disengagement or suspension. If a relevant commodity department disagrees with the recommendation, Glencore’s Head of Sustainability escalates the case to the Business Approval Committee (BAC) for a final decision on continuation, discontinuation and agreed actions. The BAC, in turn, reports to Glencore’s Board of Directors.

The BAC is a sub-committee of Glencore’s ESG Committee, and comprises Glencore’s CEO, CFO, General Counsel, Head of Sustainability and other relevant corporate or business heads as required. It determines, sets guidance and criteria, and reviews business relationships, transactions or counterparties that give rise to ethical or reputational concerns.

The GRST and the Compliance team work collaboratively to manage responsible sourcing and compliance related due diligence within the supply chain. Utilising shared tools and a common platform allows for a more effective coordination in handling supplier’s due diligence. Both teams maintain and access a centralised list of declined and red-flagged parties to uphold consistent standards across commodities and operations. This coordinated approach enhances transparency, streamlines processes, and reinforces our commitment to continuous improvement for internal and external stakeholders.

The Kazzinc CEO provides strategic oversight of Kazzinc’s responsible supply chain practices. Kazzinc established a Responsible Sourcing Committee (Kazzinc Committee) composed of

**Kazzinc Ltd. – Public Responsible Supply Chain
Due Diligence report**

Kazzinc’s CEO, CFO, Chief of Metallurgy, and Chief Compliance and Business Ethics Officer, to define and implement the strategy of responsible sourcing practices for metals and minerals.

The Kazzinc CEO has appointed a Chief Compliance and Business Ethics Officer, responsible for implementation and daily management of the programme on responsible supply chain practice for metals and minerals at Kazzinc. The Chief Compliance and Business Ethics Officer regularly reports on responsible supply chain practice for metals and minerals and escalates critical issues to the Kazzinc Committee and Kazzinc CEO level and can escalate cases as necessary to Group Compliance, Group Legal or Group Sustainability in Baar, Switzerland (headquarters of Glencore).

The Chief Compliance and Business Ethics Officer also coordinates with the relevant Glencore marketing office and the GRST, to ensure that suppliers of third-party feed sourced via Glencore marketing offices have undergone the KYC and SCDD procedures. Note that when Kazzinc purchases metals and minerals directly, it conducts its own SCDD and KYC.

The Compliance and Business Ethics Department of Kazzinc is responsible for continuous improvement of Kazzinc’s Compliance programme in implementation of Glencore’s Ethics and Compliance Programme, including SCDD for metals and minerals and supplier assessment.

4.2 Internal systems of control

Training

Employees receive induction and annual training on a wide range of policies and standards, relevant to their function, which may include among others, our Code of Conduct, Supplier Code, and Responsible Sourcing, Human Rights, Anti-Corruption and Bribery, Anti-Money Laundering, Sanctions, and Raising Concerns and Whistleblowing Policies. Training includes guidance on topics such as raising concerns, facilitation payments, the giving and receiving of gifts and entertainment, and dealings with public officials. As part of our continuous improvement efforts, we have developed interactive training materials on our Supplier Code of Conduct and the risks associated sourcing metals and minerals, as well as the procurement of goods and services to enhance employees’ understanding of responsible sourcing expectations. Details on the numbers participating in training and the type of training undertaken are available in Glencore’s annual Ethics and Compliance Report, available [here](#).

Training is provided at our marketing offices and industrial assets to raise awareness and inform the respective sourcing teams on our responsible sourcing programme. Training materials include practical questions and hypothetical scenarios illustrating how responsible sourcing and ethics and compliance dilemmas might manifest themselves in an employee’s daily work.

In December 2024, Kazzinc’s Compliance and Business Ethics Department provided training on responsible sourcing practices for metals and minerals, targeting employees engaged in supplier communications and supply chain due diligence. The training covered ethical sourcing, regulatory compliance, and risk management. Based on practical case studies, participants were trained in identifying and analysing risks within supply chains, including human rights violations, environmental risks and lack of transparency. During the training, participants developed strategies

**Kazzinc Ltd. – Public Responsible Supply Chain
Due Diligence report**

for assessing suppliers and applying corrective actions to minimize risks and help ensure compliance with the Kazzinc Supplier Code and the Kazzinc Procedure for Policy Implementation. Employees responsible for supply chain due diligence bring expertise in compliance, legal, financial and production analysis, aiming for a comprehensive approach to assessing supply chain risks. This training is conducted annually as part of our efforts to ensure continuous alignment with best practices and regulatory standards.

Furthermore, Kazzinc key employees completed multiple trainings to reinforce Glencore’s behavioral expectations. 765 Kazzinc employees participated in interactive training on the Supplier Code of Conduct, as well as sourcing risks related to metals, minerals and goods and services.

Communicating the Supplier Code of Conduct and commercial contracts

We seek to incorporate our Supplier Code of Conduct in commercial contracts with relevant stakeholders and it is available on [Glencore’s](#) website. The Supplier Code of Conduct outlines our expectations and requirements of suppliers, emphasising ethical practices and compliance with our due diligence requirements. Our Supplier Code encourages suppliers to set similar expectations with their own suppliers, reflecting our commitment to cascade our conduct standards up the supply chain. Further, our Supplier Code of Conduct requires that our suppliers have zero tolerance for any form of modern slavery, forced labour or child labour (as defined by the International Labour Organization (ILO) in their operations and supply chains. We use the term zero tolerance to express that modern slavery, including child labour, has no place in our supply chains. We recognise that this does not mean that we can guarantee that our supply chains are free from modern slavery, rather we commit to working to addressing modern slavery wherever we find it, a ‘zero tolerance’ approach.

During the assessment period, the majority of the material used to produce lead ingots was sourced directly by Kazzinc and the remaining materials were sourced through Glencore’s marketing office in Switzerland. Both Kazzinc and Glencore apply the processes for onboarding suppliers and renewing supplier contracts as set out above the results are outlined in section 5.2 below. Additionally, only payments via official bank transfer are accepted, with no cash transactions allowed.

Chain of custody controls

Kazzinc has controls in place for receiving incoming material, including checks on origin of materials, licenses, consignments, bills of lading, packing lists, certificates and documents confirming and justifying supply chain participants for each supply.

- Documentation: Kazzinc monitors the origin of its feed material by ensuring that shipping documents are in place for each delivery. Certificates of Origin, Bills of Lading, packing lists, certificates of analysis and weight certificates and insurance certificates (if applicable) for all the deliveries are collected and checked at all times.
- Inspection/receiving of material: All materials received at Kazzinc are inspected against shipping document specifications. Materials are weighed, sampled, and tested in our laboratory. Nonconforming materials are reported to the Raw Materials Department that

**Kazzinc Ltd. – Public Responsible Supply Chain
Due Diligence report**

notifies the supplier and segregates the non-conforming materials pending quality reassessment or lab assay results. The materials are stored separately to prevent co-mingling.

- Metal tracking: Material movement is tracked using mass measurement and metal grade determination systems. Kazzinc uses a material management system that allows for real-time updates and captures inventory movements such as receipts, sales, transfers, or consumption promptly.

The complete chain of custody process is outlined in Kazzinc’s relevant internal procedure, which describes the traceability process for upstream suppliers of lead, gold, and silver bearing material. This comprehensive due diligence and material receipt control framework aligns with the standards set by the Responsible Gold Guidance and Responsible Silver Guidance and the JDDS demonstrating our commitment to responsible sourcing and minimising supply chain risks.

Speaking openly and raising concerns

Glencore is committed to fostering a culture where all individuals – including employees, contractors, directors, and officers working in Glencore offices and industrial assets, and third parties such as customers, suppliers, or other stakeholders – feel empowered to express concerns securely and confidentially. The Glencore Code of Conduct requires employees and contractors to raise concerns on breaches of the Code, policies or the law. Employees are also expected to report any breaches of requirements in procedures.

This also encompasses issues related to breaches of the Glencore Responsible Sourcing Policy or Supplier Code of Conduct, their underlying standards and procedures, or the law, which can be raised through either local whistleblowing contacts/reporting channels or Glencore’s [Raising Concerns Platform](#). This platform is publicly accessible, including to stakeholders such as communities, shareholders, or partners, and allows for the voicing of concerns regarding to the circumstances of mineral extraction, trade, handling, and export. The Raising Concerns Programme incorporates zero tolerance for retaliation against individuals who report issues.

Glencore’s Raising Concerns Programme is operated under senior oversight via a Raising Concerns Investigations Committee (RCIC) made up of Glencore’s CEO, CFO, General Counsel, Head of Industrial Assets, Head of Human Resources and Head of Compliance. The committee facilitates a consistent application of recommendations and sanctions across the Group, overseeing the operation of the programme and the conduct of investigations.

Kazzinc employees are informed about the Raising Concerns platform during the onboarding process and through regular updates, including posters throughout the facility. Kazzinc employees have access to the Raising Concern Platform via Kazzinc’s intranet, promoting an environment of transparency and accountability.

Below the activities performed by Kazzinc in 2024 with respect to the Raising Concerns Program:

- Presentation and awareness raising of the Raising Concerns Programme in the internal newsletter throughout 2024.
- Raising Concerns Programme slide show is available on our screen messages.

**Kazzinc Ltd. – Public Responsible Supply Chain
Due Diligence report**

Reports regarding inconsistencies in compliance with the Kazzinc Code of Conduct, Kazzinc Policy, or Kazzinc Supplier Code, or any other breach, are handled by the local specialised team, which conducts investigations under the Local Investigations Procedure with the exception of cases with a “high” severity risk, which are investigated by the Corporate Raising Concerns team.

Local complaints and grievances mechanism

Kazzinc’s local complaints and grievances mechanism is integrated with the Raising Concerns Programme. Both mechanisms are implemented locally through Kazzinc’s “Hotline” and are available to all employees, contractors, suppliers, counterparties, community members, and other stakeholders to report concerns and submit their complaints and grievances. Grievances and complaints are categorized and allocated to the relevant departments according to the Kazzinc’s Hotline Operating Procedure. The coordinator directs each report to the appropriate department based on the nature of the complaint or grievance. If the grievance or complaint is categorized as a “Protected concern”, it is investigated according to the Local Investigations Procedure.

Kazzinc created a dedicated hotline page on its website and regularly informs employees about the local hotline and the Raising Concerns Programme by sending emails, conducting periodic training sessions, and putting up posters and leaflets. Similarly, local communities have been informed about the the complaints and grievance mechanism through existing dialogue platforms.

The local channels available to address any concerns, complaints, or grievances are the following:

Via E-mail to hotline@kazzinc.com;

- Proposal Boxes: installed at checkpoints, halls of administrative buildings or on Kazzinc’s territory (in places of mass gathering);
- Via phone:
 - 8 800 080 0028;
 - +7 705 795 68 05;
 - +7 705 795 68 15.

Kazzinc does not take any retaliatory action against anyone who reports a violation that they consider to be unethical, illegal or inappropriate in accordance with our Code of Conduct and Supplier Code, even if their concerns are not confirmed.

There have been no recorded concerns, complaints or grievances raised with regards to Kazzinc’s supply chain of metals and minerals during the assessment period.

4.3 Record keeping system

Glencore’s [Information Governance Policy](#) sets out our approach to handling company information, including personal data. Glencore’s headquarters information on suppliers is stored according to the local Retention and Destruction Procedure and a Glencore retention schedule which outlines the minimum retention time, which is based on the document type.

**Kazzinc Ltd. – Public Responsible Supply Chain
Due Diligence report**

For third-party feed directly purchased by Kazzinc, SCDD and KYC is conducted by Kazzinc. All records relating to responsible sourcing are maintained as required under local law on national document retention practice and the [Information Governance Policy](#). Kazzinc keeps records and stores documents on the supply chains in accordance with the RK legislation on National Archival Fund and Archives dated 22 December 1998, and RK Law “On Counteraction to Legalization of Illegal Incomes (Money Laundering) and Financing of Terrorism”. Relevant documents are kept for a minimum of ten years.

5 Risk identification**5.1 Our approach****Know Your Counterparty (KYC)**

Corporate and regional compliance teams screen suppliers against sanctions, law enforcements, regulatory enforcements and politically exposed person (PEP) watch lists for compliance with anti-money laundering (AML), KYC, counter terrorist financing and PEP regulations.

Supply chain due diligence

As outlined in the Group Responsible Sourcing Policy, Glencore has a comprehensive framework for identifying and managing key risks in our metals and minerals supply chains, from supplier due diligence, selection, onboarding and monitoring, through to disengagement.

The GRST reviews and assesses the presence of any OECD DDG defined red flags relating to third-party suppliers and the materials we source from these. The supplier is assessed against risks associated with the extraction, transport or trade of minerals specified in the OECD DDG’s Annex II. To support the identification of these red flags we use a list of Conflict Affected and High-Risk Areas (CAHRAs). CAHRAs are typically regions or countries with socio-economic and political crises, institutional deficiencies and weak rule of law, and widespread violence including armed conflicts. Such countries are susceptible to human rights abuses, including torture, cruel, inhumane and degrading treatment, child, forced or compulsory labour and sexual violence.

We develop and maintain our CAHRAs list using internationally recognised indices on conflict, democracy and rule of law, and human rights. Our CAHRAs list also considers the US Dodd Frank Act, the EU indicative and non-exhaustive CAHRA list for tin, tantalum, tungsten and gold, and countries where artisanal and small-scale mining (ASM) is prevalent for minerals sourced by Glencore.

The GRST updates the CAHRAs list annually to reflect significant changes in country circumstance in consultation with an external consultant. In 2024, the following relevant indices were used to obtain the list of CAHRAs (countries and regions):

Child labour

- [UNICEF Children’s Rights in the Workplace Index 2023 \(updated June 2023\)](#)
- [US Department of Labour List of Goods Produced by Child Labour or Forced Labour 2022 \(updated 28 September 2022\)](#)

Modern slavery, forced labour and human trafficking

- Prevalence of Modern Slavery 2023 (updated 6 April 2024)
- [US Department of Labor List of Goods Produced by Child Labor or Forced Labor](#) (updated 28 September 2022)

Gross Violations of Human Rights

- [Fragile States Index 2023](#) (updated 30 June 2023)
- [World Governance Indicators 2022](#) – Political Stability and Absence of Violence/Terrorism (updated 29 September 2023)

Conflict

- Armed Conflict Location and Event [Database](#) (ACLED) (updated 12 April 2024)
- [Fragile States Index 2023](#) (updated 14 June 2023)
- [Global Peace Index 2023](#) (updated 28 June 2023)
- [World Governance Indicators 2022](#) – Political Stability and Absence of Violence/Terrorism (updated 29 September 2023)
- [Indicative, non-exhaustive list of Conflict-Affected and High-risk Areas under Regulation \(Eu\) 2017/821 December 2023](#), also known as the “EU CAHRA List” (updated March 2024)

Corruption (including illegal taxation or extortion)

- [World Governance Indicators 2022](#) – Control of Corruption (updated 29 September 2023)
- [Corruption Perceptions Index 2023](#) (updated 1 January 2024)

Artisanal and small-scale mining (ASM)

- An overview of countries where ASM is present for minerals sourced by Glencore, as determined by an external consultant (The Dragonfly Initiative in house data, 2024).

If a red flag, such as negative news, or other potential risks are identified during the screening process, suggesting a potential breach of our Supplier Code, the GRST initiates enhanced due diligence (EDD). Risk identification tools include third-party database screenings, open-source desktop research, and supply chain due diligence questionnaires. When necessary and where feasible, on-the-ground assessments may also be conducted as part of EDD. Our Responsible Sourcing Policy aligns with the OECD DDG on managing OECD DDG Annex II risks, including the principles of suspension and termination where required.

Kazzinc allocates appropriate resources and assigns clear roles, responsibilities, and accountabilities within Kazzinc to implement Glencore’s Responsible Sourcing Programme. Kazzinc assesses suppliers based on their risk and directs them to the most appropriate management process for their risk level that aligns with approach applied by Glencore.

**Kazzinc Ltd. – Public Responsible Supply Chain
Due Diligence report**

Kazzinc's risk assessment process for the procurement of metals and minerals is outlined in the Kazzinc Procedure. As part of the risk identification process, Kazzinc identifies whether our third-party suppliers of metals and minerals are located in, sourcing from or transporting minerals through CAHRAs, areas recognized as UNESCO World Heritage Sites and restricted resource areas, and if so, whether they may be connected to a human rights violation.

A similar approach is applied by GRST for the third party feed procured by Glencore marketing offices and processed by Kazzinc. Kazzinc receives the results of these assessments from the ZnCu Sustainability Team /relevant marketing team or GRST on a regular basis.

5.2 Risk identification – results

Kazzinc received and processed material from Glencore industrial assets and from third-party suppliers. Screening for third party feed processed by Kazzinc was conducted by GRST and Kazzinc following the risk-based approach described in Section 5.1.

Gold and silver:

The silver and gold produced by Kazzinc is both as by-products of lead, copper, and zinc processing and from primary sources. The point of origin for the gold and silver produced as by-products is Kazzinc's refinery.

Following the EDD process on the third-party suppliers from which Kazzinc received and processed silver and gold from primary sources, none of the feed was sourced from or transited through CAHRAs, and no negative news or issues related to these suppliers were identified.

Following the screening of the third-party suppliers from which Kazzinc received feed and subsequently processed silver and gold as by-products, it was determined that four of these suppliers provided such feed that originated from CAHRAs, triggering the need for EDD. For two of these suppliers, gold and silver were extracted as by-products from lead-bearing material, details on the risk-identification outcome on these can be found below (see 'Lead').

For the other two third-party suppliers for which EDD was triggered, the gold and silver was extracted as by-products from zinc and copper-bearing material. Following the outcome of the EDD process, these two suppliers were de-risked based on the information they provided, their management systems align with the OECD DDG framework.. They have provided documentation to demonstrate they have implemented controls and procedures to effectively manage risks within their supply chains. No issues were identified in relation to human rights violation, environmental concerns or unethical business practices.

Lead:

Following the screening of third-party suppliers from which Kazzinc received and processed lead-bearing material, red flags were identified for two suppliers, triggering the need for EDD. The first supplier of lead-bearing feed originating from a known CAHRA is a subsidiary of a large multinational mining company with operations worldwide. Following the EDD process, the GRST determined that

**Kazzinc Ltd. – Public Responsible Supply Chain
Due Diligence report**

the parent entity has robust management systems in place to effectively identify and manage risks in their operations and supply chains. The parent entity is a member of the World Gold Council (WGC) and publishes an annual Conflict Free Gold report. The specific operation, and supplier, from which Kazzinc received feed material has implemented the WGC's Conflict Free Gold Standard.

The second third-party supplier of lead-bearing feed was de-risked following the outcome of EDD, as it was concluded that this supplier has aligned its operations with widely recognised international frameworks and the OECD DDG. Additionally, the supplier has provided documentation to demonstrate they have controls and procedures to effectively identify and mitigate risks related to the extraction, processing and transport of the material supplied.

6 Risk mitigation

We are committed to addressing OECD DDG Annex II risks identified through our Responsible Sourcing Programme.

Where the GRST identifies high risk suppliers based on the presence of OECD DDG red flags or negative news, GRST initiates EDD including supplier engagement, and, if relevant and feasible, designs bespoke Corrective Action Plans (CAPs) tailored to the severity of the risks identified and the size and complexity of the supplier's company. Specific timeframes for measuring objective improvements are detailed in the CAPs, which are incorporated into the supplier's contractual obligations where appropriate and feasible.

When sourcing from, operating in, or transiting through CAHRAs, Glencore follows the OECD DDG including the suspension and termination guidance on risks outlined in the Annex II of the OECD DDG which is reiterated in Glencore's Responsible Sourcing Policy. As detailed in Section 5.2, outreach efforts with the third-party suppliers who underwent EDD were successful, and thus no bespoke risk mitigation measures were implemented in 2024.

7 Extractive Industry Transparency Initiative

Glencore has been an active supporter of the Extractive Industry Transparency Initiative (EITI) since 2011 and engages with the EITI at both local and international levels. Glencore is supportive of the EITI and the objective of the EITI Association to make the EITI Principles and the EITI Standard the internationally accepted standard for transparency in the oil, gas, and mining sectors.

Where we operate in EITI member countries, we provide local EITI disclosures, participate in local multi-stakeholder groups and engage in policy consultation processes as appropriate.

Glencore promotes commodity-trading transparency by disclosing the payments Glencore makes to state-owned enterprises in EITI member countries for the purchases of crude oil, minerals and metals. Our [annual Payments to Governments report](#) is prepared in line with UK Transparency Requirements, which were introduced to implement the payments to governments requirements provided for in the EU Transparency and Accounting Directives (in the form as they continue to apply

***Kazzinc Ltd.* – Public Responsible Supply Chain
Due Diligence report**

following the UK's exit from the European Union) and includes a voluntary additional report of payments by 'regions and commodity'.

8 Kazzinc management conclusion

An independent assessment conducted by BDO Qazaqstan LLP of Kazzinc's Responsible Sourcing Programme has confirmed Kazzinc's conformance with the Responsible Gold Guidance and Responsible Silver Guidance, with no non-conformances or findings having been found.

Zh.Zhanbotin
Chief Executive Officer

M.Kassymova
Chief Compliance and Business ethics Officer

**Kazzinc Ltd. – Public Responsible Supply Chain
Due Diligence report****Important information**

This material does not purport to contain all of the information you may wish to consider. The general approach to our responsible sourcing programme described herein may be subject to certain exceptions. For example, for certain business activities we apply a bespoke approach, such as in connection with the purchase of certain energy products when aspects of our responsible sourcing programme may not be possible to observe due to market practice and other factors.

Cautionary statement regarding forward-looking information

Certain descriptions in this document are oriented towards future events and therefore contains statements that are, or may be deemed to be, “forward-looking statements” which are prospective in nature. By their nature, forward-looking statements involve known and unknown risks, uncertainties and other factors which may cause actual results, performance or achievements to differ materially from any future events, results, performance, achievements or other outcomes expressed or implied by such forward-looking statements. No statement in this document is intended as any kind of forecast (including, without limitation, a profit forecast or a profit estimate), guarantee or prediction of future events or performance and past performance cannot be relied on as a guide to future performance. Except as required by applicable rules or laws or regulations, Glencore is not under any obligation, and Glencore and its affiliates expressly disclaim any intention, obligation or undertaking, to update or revise any forward-looking statements, whether as a result of new information, future events or otherwise. For further information, see the “Important notice” section of the latest Half-Year Report and Annual Report of Glencore plc, which can each be found at glencore.com/publications.

Information preparation

In preparing this document, Glencore and/or its affiliates have made certain estimates and assumptions that may affect the information presented. Certain information is derived from management accounts, is unaudited and based on information available at the time. Figures throughout this document are subject to rounding adjustments. The information presented is subject to change at any time without notice and we do not intend to update this information except as required. Subject to any terms implied by law which cannot be excluded, Glencore accepts no responsibility for any loss, damage, cost or expense (whether direct or indirect) incurred by any person as a result of any error, omission or misrepresentation in information in this document.

Other information

The companies in which Glencore plc directly and indirectly has an interest are separate and distinct legal entities. In this document, “Glencore”, “Glencore group” and “Group” are used for convenience only where references are made to Glencore plc and its subsidiaries in general. These collective expressions are used for ease of reference only and do not imply any other relationship between the companies. Likewise, the words “we”, “us” and “our” are also used to refer collectively to members of the Group or to those who work for them. These expressions are also used where no useful purpose is served by identifying the particular company or companies.