

Refiner's Compliance Report

Table 1 - Information about the Refiner	
Name of the Refiner	Tau-Ken Altyn LLP
Location	Bldg. 1, A194 Street, ZooT4Y9 Astana, Republic of Kazakhstan
End of the reporting period	31.12.2023
Report date	29.03.2023
Supervisor, responsible for this report	A.S. Tleulin, CEO S. Tleubergen, Head of Commercial Tel. +7 (7172) 30-94-70, e-mail: s.tleubergen@taukenaltyn.kz

Tau-Ken Altyn LLP's compliance evaluation

Table 2 - Summary of actions undertaken to demonstrate compliance
Step 1: Establish strong supply chain management systems
<p>Confirmation of compliance:</p> <p>Tau-Ken Altyn LLP (hereinafter referred to as the "Company" or "Refiner") has complied the requirements of Step 1: Establish strong supply chain management systems.</p>
<p>Does the Refiner have a policy regarding compliance verification of the gold supply chain?</p> <p>Tau-Ken Altyn LLP has adopted a Responsible Gold Supply Chain Policy (hereinafter referred to as the "Policy") that complies with the requirements of the London Bullion Market Association (hereinafter referred to as "LBMA") Guidelines for Responsible Gold Handling (hereinafter referred to as the "Guidelines") LBMA") October 23, 2018, last updated version was approved January 5, 2022. Gold supply chains are also regulated by the following documents adopted by the Company:</p> <ul style="list-style-type: none"> • Rules for the preparation, approval, conclusion, storage, monitoring of the execution of contracts; • Instructions on the procedure for recording and storing precious metals, collecting and preparing samples, removing actual balances of precious metals and conducting an inventory; • Compliance Policy; • Rules for compliance verification of counterparties; • Anti-corruption policy; • Occupational safety and health policy; • Environmental Policy. <p>The policies and regulations listed above were compliant with the requirements of the LBMA's Responsible Gold Sourcing Guidelines and were sufficient to prevent dealing with high-risk suppliers. The Company assesses the level of risk in the gold supply chain as low, since the bulk of gold-containing raw materials is mined in the territory of the Republic of Kazakhstan by suppliers registered in the Republic of Kazakhstan (hereinafter referred to as the "RK"), who have contracts and licenses for subsoil use with the Ministry of Industry and Infrastructure Development of the Republic of Kazakhstan and whose activities are regulated by the Law of the Republic of Kazakhstan dated August 28, 2009 No. 191-IV "On combating the legalization (laundering) of proceeds from crime and the financing of terrorism" (as amended and supplemented as of September 12, 2023) (hereinafter referred to as the Law about AML/CFT).</p>

According to the Compliance Policy, the Partnership's compliance officer ensures compliance with all existing obligations or compliances, as well as requirements that must be fulfilled in accordance with the law and the requirements of the LBMA. The measures used by the compliance officer to minimize the risks of non-fulfillment by the Partnership or a counterparty of its obligations, as well as involvement in corruption activities when establishing business relationships with clients and counterparties are:

- comprehensive verification of the reliability and business reputation of potential counterparties, their shareholders and beneficial owners in accordance with the Rules for conducting due diligence of counterparties;
- inclusion of anti-corruption and sanctions clauses in concluded contracts, requiring counterparties to comply with the compliance and anti-corruption policies established in the Partnership, as well as the right to an audit if violations are identified or if there are sufficient grounds;
- informing potential counterparties about the company's principles and requirements in the field of compliance by posting information on the corporate website and holding relevant information sessions for counterparties.

Due diligence checks should be carried out at a certain frequency so that changes and new information about counterparties can be taken into account accordingly. According to the Compliance Policy and the Rules for Compliance Verification of Counterparties, in the absence of a positive conclusion from the compliance officer, the Partnership cannot enter into transactions with this supplier. The decision to continue relations with suppliers is made annually by the Partnership's Supervisory Board, after carrying out all check procedures for compliance with the LBMA Guidelines. Thus, at the end of the year or upon fulfillment of the terms of the contract (volume of gold supply), the Partnership resumes the process of checking the counterparty for reliability in accordance with the LBMA Guidelines, taking into account the updating of all documents of the counterparty.

In 2022, taking into account the current geopolitical situation caused by sanctions against the Russian Federation, including the imposed ban on the import of Russian gold, the Partnership was forced to suspend cooperation with JSC FIK Alel in order to minimize the risk of excluding the Refiner from the list of Good Delivery suppliers London Bullion Metal Exchange (LBMA), as long as the ultimate beneficiaries and/or the legal entity as a whole are on the sanctions lists.

These changes in the geopolitical situation in the world had an impact on the supply of gold-containing raw materials also in 2023. Thus, from May 22, 2023, the Partnership suspended work with AGMK LLC due to the imposition of sanctions against the Russian company JSC Polymetal and companies in which the share of JSC Polymetal directly or indirectly is 50 percent or more. At the same time, the raw materials of AGMK LLC are mined at the Bakyrchik deposit (RK), the gold-containing concentrates of which are exported to the Russian Federation with subsequent return for refining to Tau-Ken Altyn LLP in the form of Doré alloy. However, in September 2023, the Partnership entered into an agreement for the supply of gold-containing raw materials with Bakyrchik Mining Company LLP.

All domestic counterparties of the Partnership are subjects of financial monitoring, and their activities are regulated by the current Legislation of the Republic of Kazakhstan. In addition, all contracts of Tau-Ken Altyn LLP include a clause on compliance with LBMA guidelines and immediate notification in the event of inclusion of beneficial owners on sanctions lists. All counterparties are constantly monitored for inclusion in sanctions lists. In 2023, no high-risk suppliers were identified in the gold supply chain.

The policy is posted on the official website of the Company: <https://taukenaltyn.kz/good-delivery>.

To date, the Partnership has implemented ESG environmental principles in accordance with the Environmental Policy, on the basis of which the Partnership undertakes - clause 3.4. Monitor and ensure the rational use of natural, material and energy resources at all Steps of the Representative Office's production activities. Since the counterparties are subsoil users who have an Environmental Permit for Impact for Category I objects, issued by the Ministry of Ecology and Natural Resources of the Republic of Kazakhstan, this point is complied with by the company, since in order to obtain this permit, the counterparties must comply with all requirements, apply technology and carry out

activities in accordance with the above paragraph including taking into account the rational use of water resources, in accordance with Article 106 of Chapter 9 of the Environmental Code of the Republic of Kazakhstan (hereinafter - EC). Contractors who have an Environmental Permit do not engage in unauthorized use of World Heritage sites and protected areas. Since this is prohibited by the Law of the Republic of Kazakhstan dated July 7, 2006 No. 175-III "On Specially Protected Natural Areas" (as amended and supplemented as of March 7, 2023), this requirement is taken into account by the Ministry of Ecology and Natural Resources when issuing an Environmental Permit. In this regard, Tau-Ken Altyn LLP does not conduct business with contractors who do not have an Environmental Permit. Since, violation of the above requirements entails the suspension and deprivation (revocation) of an environmental permit (clause 1 of Article 109 of the EC RK), a ban on activities and criminal liability.

This Environmental Policy reflects the commitment of Tau-Ken Altyn LLP to environmental issues, occupational safety, and the health of personnel and local residents. Methods and actual activities are prescribed in environmental plans and other regulatory documents developed on the basis of this policy.

At the same time, the Partnership has developed and implemented Waste Management Rules and a Waste Management Program, which regulate the requirements for the handling, storage and disposal of waste, including hazardous chemicals.

The waste management program provides measures to ensure a gradual reduction in waste volumes by:

- improvement of production processes;
- reuse of waste or transfer it to persons interested in its use;
- recycling waste using the best available technologies.

The Partnership uses the Register of Environmental Requirements. According to clauses 12 and 13 of the Register, the Partnership applies environmental standards approved by the Ministry of Environment.

Additionally, in order to prevent and reduce the possible adverse effects of mercury and its compounds on the human body and the environment by carrying out measures for the demercurization of mercury-contaminated premises and equipment (in the event of mercury-containing raw materials entering the processing), the Partnership has introduced Instructions for the prompt and preventive demercurization of premises, dust and gas purification systems and exhaust ventilation systems.

The Instructions for Demercurization present the maximum permissible levels of contamination with mercury and its vapor. In accordance with the Report on the implementation of preventive demercurization at the Refiner for 2023, it was found that:

- the content of hazardous chemical waste does not exceed the maximum permissible standards;
- the content of mercury vapor residues in the air of the working area does not exceed the maximum permissible standards;
- hazardous liquid and solid waste were disposed of in accordance with the waste disposal passport.

In addition, in 2024, the Refiner plans to approve the Sustainable Development Policy, as well as the Road map for the implementation of measures for its effective implementation.

Comments and confirmation of compliance:

The Responsible Gold Supply Chain Policy was approved by the Director of the Partnership and came into force on 23 October 2018. The last updated version was approved on 5 January 2022, following the publication of an updated version of the LBMA.

The Partnership systematically monitors updates to the guidelines published on the official website of the London Gold Trading Association (LBMA) and makes necessary adjustments to its Policy as necessary.

All key business units carefully attended webinars on the implementation of the new RGG policies and disclosure guidelines.

At the same time, in order to achieve full compliance with the requirements of the LBMA Guidelines, the Partnership has approved a Corrective Action Plan for compliance with the requirements of the LBMA Guidelines.

Table 1.

Corrective Action Plan
By compliance with the requirements of the LBMA Guidelines Tau-Ken Altyn LLP

No.	Summary of the discrepancy	Audit recommendations	Planned corrective actions	Period of execution
1	The Company's internal policies do not provide detailed guidance regarding the process for identifying countries and high-risk areas (CAHRA). (LBMA RGG, step 1, p. 1.1)	Taking into account the changes that occurred in the structure of the Company's supplier counterparties during the reporting period, we recommend that you pay attention to the need to bring the Company's internal policies into full compliance with the requirements of the LBMA Guidelines.	Updating the Responsible Gold Supply Chain Policy in terms of identifying and assessing country risk in the gold supply chain.	01.07.2024
2	The Company's internal policies do not contain provisions regarding environmental management, in terms of requirements for unauthorized use of World Heritage sites and protected areas. (LBMA RGG, step 1, p. 1.1)		Updating the Environmental Protection Policy of Tau-Ken Altyn LLP regarding requirements for unauthorized use of World Heritage sites and protected areas.	01.07.2024
3	The Company's internal policies do not contain provisions for identifying location risks to ensure that mines are not located in World Heritage areas. (LBMA RGG, step 2, p. 2.1)		Updating the Policy on Responsible Treatment of Gold Supply Chains in terms of identifying and assessing the risk of location of counterparties' mines in areas recognized as World Heritage Sites in the gold supply chain.	01.07.2024
4	Domestic policies also lack zero tolerance provisions for gold mined in World Heritage sites. (LBMA RGG, step 2, p. 2.2)		Updating the Responsible Gold Supply Chain Policy regarding Zero Tolerance in relation to gold mined in areas recognized as World Heritage Sites.	01.07.2024
5	The Company's internal policies do not contain provisions regarding the risks of militarization of minefields and transport routes. (LBMA RGG, step 2, p. 2.3)		Updating the Responsible Gold Supply Chain Policy to identify and assess the risk of militarization of minefields and transport routes in the gold supply chain.	01.07.2024
6	The Company's internal policies do not contain provisions regarding actions aimed at monitoring the implementation of the improvement plan by counterparties-suppliers in the event of a decision to continue the relationship. (LBMA RGG, step 3, p. 3.2)		Updating the Gold Supply Chain Responsibility Policy in relation to actions aimed at monitoring counterparties' implementation of the improvement plan in the event of a decision to continue the relationship.	01.07.2024

Has the Refiner set up an internal management structure to support supply chain due diligence?

The Company set up a formalized internal management structure to support supply chain due diligence. The description of the structure is reflected in the Instructions on the procedure for recording and storing precious metals, collecting and preparing samples, taking actual balances of precious metals and conducting an inventory.

Comments and confirmation of compliance:

With the commencement of the Policy, the management processes, reporting, internal audit procedures and similar mechanisms used to conduct due diligence on gold supply chains have been developed in accordance with the LBMA Guidance. At the same time, the Partnership monitors changes made by LBMA to the Responsible Gold Guidance policy (hereinafter referred to as “RGG”) and takes appropriate measures.

The commercial service of the Partnership monitors the market and attracts new counterparties / monitors existing contracts, collects and updates documents for the KYC procedure and the necessary compliance checks.

Since 2021, the Partnership has had the position of a compliance officer.

In order to ensure a reliable supply chain and prevent violations of the LBMA principles, the compliance officer analyzes the provided documents, studies information about the counterparty, its manager, shareholders (participants) and ultimate owners in information databases, web resources (official websites of exchanges, companies, etc.). d.) and in additional sources of information.

In accordance with established procurement procedures, the legal service and compliance officer of the Partnership deal with compliance with anti-money laundering legislation by reviewing/negotiating contracts, participating in compliance audits, and performing “know your counterparty” procedures.

Based on the results of the inspections, the issue of approving transactions for the acquisition of gold-containing raw materials is sent for consideration to the Supervisory Board of the Partnership with the conclusion of a compliance officer and comments from the legal service and the economics and risk management service.

The Partnership's commercial service has been appointed to be responsible for compliance issues, which manages the process with direct reporting to the company's senior management. All counterparty information, including raw material procurement transactions, is monitored for compliance with gold supply chain due diligence requirements. Information about all suspicious transactions is transmitted to the commercial service, which in turn is reported to the top management of the Partnership.

Contracts include provisions for practice guidance regarding the compliance of contractors' activities with the principles and procedures of the LBMA. The commercial service also provides information support to counterparties in order to ensure compliance of their activities with the goals and principles of the LBMA.

Job descriptions of responsible structural units provide for the requirements for the availability of relevant competencies necessary to ensure high-quality selection of suppliers of gold-containing raw materials.

During the reporting period, no violations were observed in the internal due diligence processes.

Has the Company established a strong internal system of due diligence, controls and transparency over gold and precious metals supply chains, including traceability and identification of other supply chain actors?

Yes, the Company has developed a strong internal system of due diligence, control and transparency in relation to gold supply chains.

Comments and confirmation of compliance:

The Company has established a process for managing the supply of raw materials, has introduced systematic processes for accepting batches of primary and secondary gold, and examining it to ensure that the necessary documentation has been received and the appropriate records have been made before the materials are processed. The process of documenting, transferring and storing gold-containing raw materials is regulated by the Instruction on the procedure for recording and storing precious metals, selecting and preparing samples, taking actual balances of precious metals and conducting an inventory. The company has developed a reliable internal system of examination, control and transparency in relation to gold supply chains.

Before starting processing of gold-bearing raw materials, the Company receives documents, which include a contract (or other title document) for subsoil use for the supplied gold-bearing materials, charter documents and other documents recommended for verification by the LBMA. All details of the transaction are documented, such as information about the supplier, information on the type and weight of gold-containing raw materials. Each delivered batch is accompanied by the necessary documents in accordance with the terms of the contracts. Before the start of processing of raw materials, special control procedures are carried out, prescribed by the internal instructions of the Company.

Also, we note, in accordance with paragraphs. 15) clause 1 art. 3 of the AML/CFT Law, individual entrepreneurs and legal entities carrying out transactions with precious metals and precious stones, jewelry made from them are subjects of financial monitoring (FMS). From 2022, in accordance with Art. 4 of the AML/CFT Law, the purchase and sale (transaction) of precious metals and precious stones, jewelry made from them in cash or non-cash form is subject to financial monitoring if the transaction amount is equal to or exceeds 5,000,000 tenge, or is equal to an amount in foreign currency equivalent 5,000,000 tenge or exceeding it. In accordance with Art. 10 of the AML/CFT Law, SFM provide to the authorized body (Agency) information and information about transactions subject to financial monitoring, which contain information about SFM, information about the transaction, including information about the participants in the transaction, and, if necessary, a sign of identifying a suspicious transaction, additional information on the transaction subject to financial monitoring.

Thus, all transactions of the Partnership and its counterparties with precious metals are subject to reporting to the authorized body in accordance with current legislation.

Has the Refiner strengthened company engagement with gold supplying counterparties and (where possible) assisted gold supplying counterparties in building due diligence procedure?

Tau-Ken Altyn LLP strengthened interaction with suppliers of gold-containing raw materials and informed them of the need to comply with the requirements of the LBMA Guidelines.

Comments and confirmation of compliance:

Procedures for “Due Diligence” checks are regulated by the Rules for the preparation, approval, conclusion, storage, monitoring of the execution of contracts and are supported by the Procurement Procedure of JSC “National Welfare Fund “Samruk-Kazyna” and legal entities, fifty or more percent of voting shares (participation shares), which directly or indirectly belong to Samruk-Kazyna JSC under the right of ownership or trust management (approved by the decision of the Board of Directors of Samruk-Kazyna JSC No. 193 dated 03/03/2022), acting on Tau-Ken Altyn LLP .

The Partnership carries out a comprehensive check of counterparties in order to minimize the risk of cooperation with persons involved in any illegal activities. The compliance check is aimed at providing reasonable confidence that the Partnership “knows” its counterparties and that they all comply with the current legislation of the Republic of Kazakhstan and ethical standards, and also have an impeccable reputation and are not subject to international sanctions.

For these purposes, the Partnership has developed and implemented a Compliance Policy and Rules for compliance verification of counterparties. The Rules for Compliance Verification of Counterparties establish the procedure for conducting due diligence checks on counterparties before establishing any relationship with them, and also involve assessing counterparties for potential compliance risks, including their compliance with the LBMA Guidelines.

Compliance checks of counterparties are carried out before the conclusion of a contract/agreement with the counterparty, or the adoption of an appropriate decision by the authorized body of the Partnership, as well as after twelve months from the date of the check (in case of continued cooperation).

When conducting a compliance audit, the compliance officer sends recommendations on compliance and/or a request for additional information (or elimination of other comments) necessary to complete the compliance audit.

The commercial service monitors counterparties for timely implementation of recommendations for the effective continuation and development of cooperation.

The result of the compliance audit is a compliance officer's report, which is valid for twelve calendar months. Due diligence checks should be carried out at a certain frequency so that changes and new information about business partners can be taken into account accordingly.

Each counterparty undergoes identification, and each contract undergoes an internal approval procedure. In addition, the availability of supplier verification procedures is a requirement of the AML/CFT Law, which all Companies in the Republic of Kazakhstan working with precious metals are required to follow. All raw materials supplied to Tau-Ken Altyn LLP during 2023 have a primary origin in the territory of the Republic of Kazakhstan. Management continually engages with gold suppliers to ensure supply chain compliance with AML/CFT Laws.

Corresponding requirements for suppliers' obligations to comply with the requirements of the LBMA Guidelines and to develop policies in accordance with Annex II of the OECD Due Diligence Guidelines are included in the terms and conditions of contracts with suppliers.

The Republic of Kazakhstan is included in the EITI list and the Partnership is ready to disclose all necessary information on supplies if necessary.

Has the Refiner established a company-wide communication mechanism to promote broad-based employee participation and risk identification to management?

Tau-Ken Altyn LLP has established a company-wide communication mechanism to promote broad involvement of the Company employees and to report any risks identified to the Company's management.

Comments and confirmation of compliance:

The Company's marketing department performs the functions of complying with the LBMA Guidance, tracking raw material chains and supporting activities to attract raw materials in the Partnership. The functions of identifying and managing risks fall within the competence of the leading analyst and risk manager.

The Company has developed internal communication procedures designed to allow employees to voice their concerns in relation to precious metals supply chain, or newly identified risks.

The Company has appointed a responsible person (a designated AML officer) who reports compliance with the Internal Control 1 Rules directly to the e Company's Director. The Management Representative in Charge of the Policy (Incoming Controller) was also appointed as required by the Policy.

If any indication of an unusual transaction (deal) being performed by the counterparty that is subject to control under AML/CFT law, or any sign of extraordinary nature, is identified, the Company's employee should prepare a notification on such deal and send it to the Management Representative in Charge of the Policy who will take further decision on whether the transactions identified should be qualified as unusual or documented as required by the law. In the group of companies of Samruk-Kazyna JSC, a single hotline has been introduced and is being used, the contacts of which are reflected in all contracts of SDCs of Samruk-Kazyna JSC and on the websites of these companies. In addition, there is "feedback" on the Partnership's website, a feedback box is installed at the checkpoint, hotline contacts are posted on the territory of the Partnership. All of the above tools for appeals and feedback are available both for internal access and for third parties. period, no complaints/appeals were received.

Step 2: Identify and assess risks in the supply chain

Compliance statement with the requirement:

The Company has complied with the requirements of Step 2 "Identify and assess risks in the supply chain"

Does the Refiner have a process to identify risks in the supply chain?

Yes, the Company has organized a process for identifying risks in the supply chain in accordance with the requirements of the LBMA Guidelines and by AML/CFT Law. The company approved the Policy on October 23, 2018, the last updated version was approved on January 5, 2022.

Comments and demonstration of compliance:

The Company identifies risks for all counterparties before entering into any business relationships with them through contractual procedures and “KYC” procedures.

In addition, on the territory of the Republic of Kazakhstan there is a unified electronic database that allows employees of the Company to check the presence/absence of tax debt for all legal entities registered in the territory of the Republic of Kazakhstan, as well as electronic judicial databases that allow, if risks are suspected, to carry out additional verification by searching/ analysis of the register of court cases in which the company was involved, for a particular judicial authority.

At the same time, in accordance with the recommendations of the RGG, the Policy provides for inspection visits by the Partnership’s employees to counterparty companies (on a selective basis) to inspect gold mining Company’s and ensure due confidence that the Company’s comply with the principles of the RGG. Based on the results of the visits, relevant reports are drawn up.

It should be noted that the majority of the Partnership’s suppliers are residents of the Republic of Kazakhstan and have been cooperating with the Partnership for several years. In 2023, the Partnership’s employees carried out on-site monitoring visits; no potentially risky suppliers were observed.

In this regard, the scope of procedures for identifying risks in supply chains was sufficient to provide adequate confidence that supplies comply with the requirements of the Policy. To review applications for cooperation, if necessary, a compliance officer of the sole participant of the Partnership with access to expanded databases was involved.

The Supervisory Board does not consider issues of approving transactions with potential suppliers until the corresponding conclusion is provided from the compliance officer.

The Company has processes for identifying risks in the supply chain based on assessments of country risks, company risks and product risks, and has also implemented a Compliance Policy. The IRR data describes the processes and frequency of risk identification, risk analysis and assessment. Identification of risks, including those of a corruption nature, includes identifying sources of risk, processes and procedures in which risks can be realized, thus:

Country risk: arises as a result of high levels of corruption in a particular country or region, including due to a lack of legislation, as well as the failure of the local business community, media and civil society to develop transparent rules for trade and investment. In our opinion, this risk is minimal, since in 2023 all gold-containing raw materials were supplied by suppliers from the Republic of Kazakhstan. In addition, in the practice of the Partnership there has never been any acquisition of raw materials in any way related to CAHRA zones.

Company risk: contracts with suppliers are concluded on an annual basis. Since 2015, the Company has taken into account the requirements of the LBMA Guidelines in all contracts concluded. In addition, according to the terms of the contracts, suppliers must provide a full package of documents to confirm the origin of gold-containing raw materials in accordance with the requirements of the Guidelines for Responsible Gold Sourcing, including:

- state license/contract for production;
- certificate of state registration;
- charter and constituent documents
- financial documents, etc.

Upon expiration of the current contracts, if there is an intention to continue cooperation, all necessary documents that require updating are requested.

To obtain a production license/contract for subsoil use of minerals in the Republic of Kazakhstan, a potential subsoil user undergoes verification of information about the company and its directors, financial and tax status in the authorized government bodies and annually, subsequently, submits reports to the relevant government bodies and is the subject of government monitoring.

As part of the procedures for verifying suppliers, the Company verifies the availability of valid mining licenses from suppliers of mined gold, and also receives documents confirming information about the managers and ultimate beneficiaries of suppliers of both mined and secondary gold.

Commodity risk: The supplied raw materials are checked for compliance with the Company's standards in terms of quantity and quality when issuing acceptance certificates. The Company agrees with suppliers on conditions for reliable transportation and proper packaging of gold-containing raw materials.

Based on the results of the supply chain audit for 2023, no high-risk counterparties were identified.

Does the Refiner assess risks associated with gold supply chain participants in line with the adopted risk assessment system?

Yes, the Company carries out risk assessments of participants in the gold supply chain in accordance with the requirements of the LBMA Guidelines. For the purpose of accepting deliveries in 2023, a full risk assessment was carried out for all suppliers. Counterparties with a high risk (related to the imposed sanctions) were not involved in the work, while cooperation with existing suppliers who were subject to sanctions against the Russian Federation was immediately terminated.

Comments and demonstration of compliance:

The company carries out a risk assessment as part of its due diligence on the gold supply chain. Chain of custody due diligence is carried out prior to entering into a business relationship with any third party as required by the Responsible Gold Sourcing Guidelines. Suppliers are monitored on an ongoing basis. The company does not work with high-risk counterparties.

The Company's risk assessment provisions are based on the AML/CFT Law of the Republic of Kazakhstan (which largely corresponds to the LBMA Guidelines but has some differences in the area of determining risk levels and rules for identifying the ultimate beneficiary/shareholder), the LBMA Policy and Guidelines. Regarding deliveries for 2023, the Company has not identified any high-risk counterparties.

In 2023, the Company complied with Step 2 requirements in relation to procedures aimed at identifying risks in the gold supply chain.

In order to confirm suppliers' compliance with AML/CFT requirements, relevant documents and comments were received, and in the event that counterparties do not have a formalized AML/CFT policy, information was searched from open sources (arbitration court files, prosecutor's office websites, bailiff services) and negotiations were held with suppliers confirming that, despite the fact that the procedures are not formalized, no violations of AML/CFT requirements have been identified. Also included in contracts with suppliers is a section "Guarantees of compliance with LBMA guidelines", obliging suppliers to comply with AML/CFT requirements and a section "Sanctions clause" reserving the Partnership's right to unilaterally terminate the contract in the event of non-compliance with the requirements of the Policy and international sanctions.

The company checked all direct and indirect counterparties for inclusion in international sanctions lists. Companies against which international sanctions were applied were denied cooperation, and therefore additional assessment procedures (on-site monitoring, etc.) were not required.

All counterparties resident in the Republic of Kazakhstan must carry out their activities in accordance with the AML/CFT Law. Most of the counterparties with whom cooperation was carried out in 2023 are not new to the Company.

Does the Refiner report risk assessment to the designated manager?

The Company informs senior management about all cases of identification of high-risk transactions.

Comments and demonstration of compliance:

The Company's management ensures full control over the supply chain by approving all new contracts and annual analysis of existing ones. Before concluding an agreement, each potential partner undergoes an approval procedure with the commercial, financial and legal departments.

The information is then sent to the compliance officer for review, and additional risk assessment activities are carried out when interacting with government agencies. If the compliance officer confirms a low level of risk, the materials are submitted for consideration to the Partnership's Supervisory Board.

Any controversial issues are carefully investigated and submitted to the senior management of the Company for consideration. The risk assessment questionnaire is sent to the responsible manager for the Policy.

Step 3: Design and implement a management system to respond to identified risks.

Confirmation of Compliance Requirements:

The Company has complied with the requirements of Step 3: Design and implement a management system to respond to identified risks.

Has the Refiner devised a strategy for risk management on identified risk by either: (i) mitigation of the risk while continuing to trade, (ii) mitigation of the risk while suspending trade or (iii) disengagement from the risk?

The Company has the process for gold supply chain risk identification as required by the anti-money laundering and counter-terrorist financing law of the RK, Policy and LBMA Guidance.

Comments and demonstration of compliance:

Risk identification is based on strictly structured control procedures that ensure that suppliers that do not comply with established contractual terms or documentation requirements are automatically excluded from being potential suppliers of gold raw materials to the Company. In 2023, the Company strictly adhered to the principle of not interacting with suppliers characterized by a high level of risk, which eliminated the need to take additional measures to reduce risk.

When identifying potential risks of cooperation with new counterparties, the Company carries out a number of analytical activities aimed at identifying risks. If risks are confirmed or even suspected, the Company will not hesitate to terminate commercial relations with such entities.

It is important to note that the Company has gone through a thorough check of all its counterparties in order to identify their affiliation with international sanctions lists. Those companies that were subject to international sanctions were immediately rejected as potential partners for cooperation, which saved the Company from the need to conduct additional assessment procedures.

The Company has implemented a number of appropriate procedures, including a system of continuous monitoring and surveillance, which are applied as necessary to ensure the best possible risk management.

On October 23, 2018, the Company approved a Policy that complies with the requirements of the LBMA Guidelines, which reflects the distribution of suppliers into categories: Low, Medium, or High risk. High-Risk transactions are those that have an indication of questionable transactions, are suspended until additional analysis is completed to reduce the risk and are subject to reporting to the regulatory authority. The activities of the Company in 2023 were based on the LBMA Policy and Guidelines updated in 2022, as well as the requirements of the Legislation of the Republic of Kazakhstan.

No cases of significant violations of social and environmental legislation by the Company's suppliers were identified in 2023. There were also no cases of increased risk in connection with the sanctions in force against the Company's suppliers, their managers and owners.

The Company's risk response actions are based on the Policy, which defines the conditions when the Company must either freeze or cease trading with medium or high-risk counterparties. Existing regulations cover the requirements of the Step 3 Guidelines.

If risks are detected, the Partnership immediately suspends work with the counterparty to carry out an appropriate assessment and the necessary measures to assess and mitigate risks. Thus, after repeated sanctions imposed due to the current geopolitical situation against the Russian Federation and some of its individuals, the Partnership was forced to cease cooperation with its long-term partner AGMK LLC.

The responsible structural divisions of the Partnership constantly monitor the imposed international sanctions, changes made to the current legislation, as well as regulatory documents and guidelines used by the Partnership's employees within the framework of their activities. During 2023, no significant changes were made to the AML/CFT Law. All measures to monitor the imposed sanctions were timely.

All employees involved in operations with gold-containing raw materials have been familiarized with the latest editions of laws and have received additional necessary internal training through familiarization with the LBMA Guidelines and Policies. In 2023, employees of responsible structural units also took part in LBMA webinars. At the same time, employees of responsible structural units received training on topics in the field of AML/CFT, economic security and other topics. This set of training activities has been assessed by the Company as sufficient to comply with the requirements of the LBMA Guidelines and the Policy in the current environment. Thus, existing regulations and processes were effective in protecting the Company from dealing with high-risk suppliers.

Risk management and mitigation strategy should include measurable steps to be taken, monitoring of performance, periodic reassessment of risk and regular reporting to designated senior management.

Risk identification is based on internal risk control procedures. In 2023, no existing high-risk suppliers were identified and therefore no risk mitigation measures were required. Cooperation agreements with potentially high-risk companies were not concluded.

After the introduction of appropriate sanctions, the Partnership terminated cooperation with AGMK LLC due to the introduction of sanctions on the final beneficiary.

Comments and confirmation of compliance:

Potentially high-risk suppliers were not involved. The existing regular procedure for approving contracts at the Company and the practice of limiting the validity of contracts to one year provide the senior management of the Company with confidence in the regular reassessment of counterparties and associated risks, as well as taking the necessary measures to reduce them. An assessment of counterparties in the gold supply chain for 2023 showed the absence of suppliers whose activities are associated with high risk.

Cooperation with companies initially assessed as low risk, but subsequently reassessed as high risk due to the introduction of sanctions, was immediately terminated.

Step 4: Arrange for an independent third-party audit of the gold supply chain due diligence

Confirmation of compliance:

The company fully complies with the requirements of Step 4: Arrange for an independent third-party audit of the gold supply chain due diligence.

Comments and demonstration of compliance:

The company has engaged an independent auditor, BDO Qazaqstan Limited Liability Partnership, accredited by the LBMA to provide services, whose reasonable assurance report on our report will be available on our website upon release.

The purchases were carried out in accordance with the Procedure for the procurement of Samruk-Kazyna National Welfare Fund JSC and legal entities, fifty or more percent of voting shares (participatory interests) that directly or indirectly belong to Samruk-Kazyna JSC under the right of ownership or trust management (approved decision of the Board of Directors of Samruk-Kazyna JSC No. 193 dated 03/03/2022), effective for Tau-Ken Altyn LLP.

Step 5: Report supply chain due diligence

Confirmation of compliance:

The Company fully complies with the requirements of Step 5: Report supply chain due diligence.

Comments and demonstration of compliance:

The Company has implemented effective management systems, procedures, processes and practices to ensure compliance with the requirements of the LBMA Guidelines.

The company adheres to a policy of continuous improvement, with constant internal monitoring of any activities carried out to eliminate identified deficiencies.

In 2018, the Company developed and implemented a Responsible Gold Supply Chain Policy in accordance with the requirements of the LBMA Guidelines. The last updated version was approved on January 5, 2022.

More detailed information about how the Company's systems, procedures, processes and controls are implemented and used to comply with the specific requirements of the LBMA Guidelines is provided in our Policy, available on the Company's website (www.taukenaltyn.kz).

To submit feedback to Tau-Ken Altyn LLP regarding this report, users of the report can send us an email to the address: sm@taukenaltyn.kz; s.tleubergen@taukenaltyn.kz.

Conclusion of Tau-Ken Altyn LLP**Table 3: Management's assessment of implementation of all five phases of the LBMA Guidelines**

Step	Rating	Comments
Step 1 - Establish strong supply chain management systems	Compliant	<p>In 2023, the Company worked with the supply chain in accordance with the requirements:</p> <ul style="list-style-type: none"> • Policies for Responsible Gold Supply Chains; • Rules for the preparation, approval, conclusion, storage, monitoring of the execution of contracts; • Instructions on the procedure for recording and storing precious metals, collecting and preparing samples, removing actual balances of precious metals and conducting an inventory; • Compliance Policy; • Rules for compliance verification of counterparties; • Anti-corruption policy; • Occupational safety and health policy; • Environmental Policy; • AML/CFT Law. <p>With regard to deliveries for 2023, the Company has not identified any high-risk counterparties.</p>
Step 2 - Identify and assess risks in the supply chain	Compliant	<p>Tau-Ken Altyn LLP has developed a Policy on responsible attitude towards gold supply chains. The policy regulates the activities of all employees of the Company related to carrying out activities to verify suppliers of gold-containing raw materials.</p> <p>For 2023, a full risk assessment was carried out for all suppliers. The Company also checked suppliers for inclusion in international sanctions lists. No high-risk counterparties were identified.</p> <p>The Company identifies risks for all counterparties before entering into any business relationships with them through contractual procedures and "know your counterparty" ("KYC") procedures.</p>

		<p>In addition, on the territory of the Republic of Kazakhstan there is a unified electronic database that allows employees of the Company to check the presence/absence of tax debt for all legal entities registered in the territory of the Republic of Kazakhstan, as well as electronic judicial databases that allow, if risks are suspected, to carry out additional verification by searching/analysis of the register of court cases in which the company was involved, for a particular judicial authority.</p> <p>At the same time, in accordance with the recommendations of the RGG, the Policy provides for inspection visits by the Partnership's employees to counterparty companies (on a selective basis) to inspect gold mining companies and ensure due confidence that the companies comply with the principles of the RGG. Based on the results of the visits, relevant reports are drawn up. It should be noted that the majority of the Partnership's suppliers are residents of the Republic of Kazakhstan and have been cooperating with the Partnership for several years. In 2023, the Partnership's employees carried out on-site monitoring visits; no potentially risky suppliers were observed. In this regard, the scope of procedures for identifying risks in supply chains was sufficient to provide adequate confidence that supplies comply with the requirements of the Policy. Since 2021, the Partnership has had the position of a compliance officer. In order to ensure a reliable supply chain and prevent violations of the LBMA principles, the compliance officer analyzes the provided documents, studies information about the counterparty, its manager, shareholders (participants) and ultimate owners in information databases, web resources (official websites of exchanges, companies, etc.) and in additional sources of information. The Supervisory Board does not consider issues of approving transactions with potential suppliers until the corresponding conclusion is provided from the compliance officer. Based on the results of the procedures carried out, the Company's management concluded that there is a low risk of dishonesty of all suppliers.</p>
<p>Step 3: Design and implement a management system to respond to identified risks.</p>	<p>Compliant</p>	<p>On October 23, 2018, the Company approved a Policy that complies with the requirements of the LBMA Guidelines, which reflects the distribution of suppliers into categories: Low, Medium or High risk. High-Risk transactions are those that have an indication of questionable transactions, are suspended until additional analysis is completed to reduce the risk, and are subject to reporting to the regulatory authority. The activities of the Company in 2023 were based on the Policy updated in 2022, the LBMA Guidelines, as well as the requirements of the legislation of the Republic of Kazakhstan.</p> <p>No cases of significant violations of social and environmental legislation by the Company's suppliers were identified in 2023.</p>

		<p>The Company's risk response actions are based on the Policy, which defines the conditions when the Company must either freeze or cease trading with medium or high-risk counterparties. Existing regulations cover the requirements of the Guidelines for Step 3. Due to the fact that in 2023 the Company received raw materials whose place of origin was the Republic of Kazakhstan; the Partnership did not describe measures to respond to the risk associated with the supply of imported material.</p> <p>If risks are detected, the Partnership immediately suspends work with the counterparty to carry out an appropriate assessment and the necessary measures to assess and mitigate risks. Thus, after repeated sanctions imposed due to the current geopolitical situation against the Russian Federation and some of its persons, the Partnership was forced to cease cooperation with its long-term partner AGMK LLC due to one of the final beneficiaries being included in the sanctions lists.</p> <p>The responsible structural divisions of the Partnership constantly monitor the imposed international sanctions, changes made to the current legislation, as well as regulatory documents and guidelines used by the Partnership's employees within the framework of their activities. During 2023, no significant changes were made to the AML/CFT Law. All measures to monitor the imposed sanctions were timely. All employees involved in operations with gold-containing raw materials have been familiarized with the latest editions of laws and have received additional necessary internal training through familiarization with the LBMA Guidelines and Policies. In 2023, employees of responsible structural units also took part in LBMA webinars. At the same time, employees of responsible structural units received training in the field of AML/CFT, economic security and other topics. This set of training activities has been assessed by the Company as sufficient to comply with the requirements of the LBMA Guidelines and the Policy in the current environment. Thus, existing regulations and processes were effective in protecting the Company from dealing with high-risk suppliers.</p>
<p>Step 4: Arrange for an independent third-party audit of the gold supply chain due diligence</p>	<p>Compliant</p>	<p>The company has engaged an independent auditor, BDO Qazaqstan Limited Liability Partnership, accredited by the LBMA to provide services, whose reasonable assurance report on our report will be available on our website upon release.</p> <p>The purchases were carried out in accordance with the Procedure for the procurement of Samruk-Kazyna National Welfare Fund JSC and legal entities, fifty or more percent of voting shares (participatory interests) that directly or indirectly belong to Samruk-Kazyna JSC under the right of ownership or trust management (approved decision of the Board of Directors of</p>

		Samruk-Kazyna JSC No. 193 dated 03/03/2022), effective for Tau-Ken Altyn LLP.
Step 5: Report supply chain due diligence	Compliant	The company has prepared all the necessary reports. The Refiner's Compliance Report and the Independent Auditor's Report are available on the Refiner's website (www.taukenaltyn.kz).

Table 4 - Management Conclusion	
Did the Company comply with the requirements of the LBMA Guidelines during the reporting period?	
Compliant	<p>During the reporting period, the Refiner strictly complied with the requirements of the Responsible Gold Sourcing Guidelines in its operations.</p> <p>In 2023, the Company strictly ensured that it did not participate in commercial transactions with counterparties marked by a high level of risk. This confirms the effectiveness of current strategies and processes aimed at protecting the Company from potential threats associated with working with risky suppliers.</p> <p>In conclusion, it is important to note that the Company has successfully implemented effective management systems, procedures and practices to comply with the requirements imposed by the LBMA Management for the reporting year ended December 31, 2023. Significant work has been done to strengthen supply chain controls and risk prevention. We continue to actively develop in this direction, taking all possible measures to improve. Any necessary corrective actions will be carried out and regularly monitored within the Company to ensure that the risk management system operates soundly and meets high standards.</p>

Table 5 - Other comments on the report
If users of this report wish to provide us with any feedback or comments regarding the report, they can contact us at s.tleubergen@taukenaltyn.kz .

APPROVED

CEO, Tau-Ken Altyn LLP



 _____ A. Tleulin

Person responsible to filling in this questionnaire:
 Head of Commercial, Tau-Ken Altyn LLP


 _____ S. Tleubergen

29 March 2024

Appendix to the Refiner's Compliance report – Country of Origin information

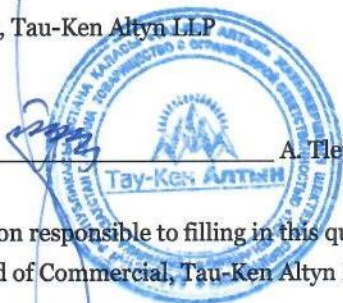
Table 1 - Information about the Refiner	
Name of the Refiner	Tau-Ken Altyn LLP
Location	Bldg. 1, A194 Street, ZooT4Y9 Astana, Republic of Kazakhstan
End of the reporting period	31.12.2023
Report date	29.03.2023
Supervisor, responsible for this report	A.S. Tleulin, CEO S. Tleubergen, Head of Commercial Tel. +7 (7172) 30-94-70, e-mail: s.tleubergen@taukenaltyn.kz

Table 2 – Countries of origin of extracted and processed raw materials	
Country	Quantity (gs)
The Republic of Kazakhstan:	50,480,536.90
primary raw materials	25,674,843.17
secondary raw materials, including:	24,805,693.73
<i>Refined gold from the National Bank of the Republic of Kazakhstan (tolling)</i>	<i>21,970,298.80</i>
Total	50,480,536.90

Table 3 - Other information				
<p>To achieve full compliance with the requirements of the LBMA Guidelines, the Partnership has approved a Corrective Action Plan for compliance with the requirements of the LBMA Guidelines.</p> <p>Table 1.</p> <p style="text-align: center;">Corrective Action Plan By compliance with the requirements of the LBMA Guidelines Tau-Ken Altyn LLP</p>				
No.	Summary of the discrepancy	Audit recommendations	Planned corrective actions	Period of execution
1	The Company's internal policies do not provide detailed guidance regarding the process for identifying countries and high-risk areas (CAHRA). (LBMA RGG, step 1, p. 1.1)	Taking into account the changes that occurred in the structure of the Company's supplier counterparties during the reporting period, we recommend that you pay attention to the need to bring the Company's internal policies into full	Updating the Responsible Gold Supply Chain Policy in terms of identifying and assessing country risk in the gold supply chain.	01.07.2024
2	The Company's internal policies do not contain provisions regarding environmental management, in terms of requirements for unauthorized use of World Heritage sites and protected areas. (LBMA RGG, step 1, p. 1.1)		Updating the Environmental Protection Policy of Tau-Ken Altyn LLP regarding requirements for unauthorized use of World Heritage sites and protected areas.	01.07.2024

3	The Company's internal policies do not contain provisions for identifying location risks to ensure that mines are not located in World Heritage areas. (LBMA RGG, step 2, p. 2.1)	compliance with the requirements of the LBMA Guidelines.	Updating the Policy on Responsible Treatment of Gold Supply Chains in terms of identifying and assessing the risk of location of counterparties' mines in areas recognized as World Heritage Sites in the gold supply chain.	01.07.2024
4	Domestic policies also lack zero tolerance provisions for gold mined in World Heritage sites. (LBMA RGG, step 2, p. 2.2)		Updating the Responsible Gold Supply Chain Policy regarding Zero Tolerance in relation to gold mined in areas recognized as World Heritage Sites.	01.07.2024
5	The Company's internal policies do not contain provisions regarding the risks of militarization of minefields and transport routes. (LBMA RGG, step 2, p. 2.3)		Updating the Responsible Gold Supply Chain Policy to identify and assess the risk of militarization of minefields and transport routes in the gold supply chain.	01.07.2024
6	The Company's internal policies do not contain provisions regarding actions aimed at monitoring the implementation of the improvement plan by counterparties-suppliers in the event of a decision to continue the relationship. (LBMA RGG, step 3, p. 3.2)		Updating the Gold Supply Chain Responsibility Policy in relation to actions aimed at monitoring counterparties' implementation of the improvement plan in the event of a decision to continue the relationship.	01.07.2024

CEO, Tau-Ken Altyn LLP



A. Tleulin

Person responsible to filling in this questionnaire:
Head of Commercial, Tau-Ken Altyn LLP

S. Tleubergen

29 March 2024