CENTRAL ASIA METALS PLC

RESPONSIBLE WASTE AND TAILINGS MANAGEMENT

At CAML, we take our environmental responsibilities seriously and ensure compliance with national laws and regulations, guided by our Environmental Policy. We are committed to minimising our impact by reducing waste generation and maximising opportunities for recycling and re-use. Our approach to waste and tailings management is underpinned by best practice, with a focus on safety and responsibility, as outlined in our Tailings Policy. This is reflected in our transition from conventional wet tailings to paste-fill mining and dry-stack tailings disposal.

Management approach:

Both of our operations have developed systems and procedures to comply with national and international best practices for waste management. Site teams continually seek opportunities to reduce waste and increase recycling.

Waste-related impacts are primarily identified during the project planning stage through environmental and social impact assessments, including stakeholder engagement and baseline studies. These impacts are reassessed throughout the operational life cycle, through ongoing monitoring and as part of broader initiatives covering climate change, biodiversity and mine closure planning.

Both sites operate Environmental Management Systems (EMSs), approved by site senior management and implemented in line with national and international standards, such as ISO 14001, International Finance Corporation Performance Standards and the Equator Principles. These are underpinned by the Group's Board-approved Environment and Tailings Policies, which apply from planning to closure.

As part of our EMSs, site-specific waste management plans are in place, which are regularly reviewed and updated to reflect changes in operational environmental and regulatory changes.

Our waste management plans at Sasa and Kounrad adhere to the following fundamental principles:

- Preventing pollution of air, groundwater and soil
- Prioritising re-use and recycling, with responsible disposal where necessary
- Reducing waste through new technologies and equipment
- Taking preventive measures to minimise environmental impact

We ensure that contractors comply with our waste management standards by working with qualified providers, setting clear expectations in contracts, offering guidance and conducting regular reviews.
Employee, contractor and supplier awareness is a priority. We conduct regular training on waste management, handling and disposing of hazardous waste, proper spill management and environmental protection and compliance, supported by on-site posters across both operations.

Tailings management

Safety is central to our approach and, with a zero-harm goal, we are firmly committed to the long-term environmental and socially responsible management of tailings at Sasa. CAML manages all tailings storage facilities at Sasa in line with national regulations. Although adoption of GISTM is not a legal requirement in North Macedonia, it is mandatory for members of the International Council on Mining & Metals (ICMM). Although CAML is not a member of ICMM, the Group has voluntarily adopted GISTM to demonstrate our commitment to safe and sustainable mining. We have achieved conformance with its rigorous and comprehensive requirements.

To reduce the impact of waste, we are transitioning to paste-fill mining at Sasa, in addition to adopting the DST method for a significant portion of the remaining tailings. DST eliminates the need for additional wet TSFs, reducing our environmental footprint and removing the need for community relocations. The DST landform is built on top of a closed TSF, avoiding greenfield disturbance. Water recovered from dewatered tailings will be recycled, reducing our reliance on surface water. Filtered, compacted tailings also reduce liquefaction risk and improve overall stability. Our Tailings Management Standard (TMS) mandates the implementation of a management system and ensures compliance with the six topic areas of GISTM and additional CAML-specific requirements. It also defines governance roles for TSF safety:

- Accountable Executive – CAML's Chief Executive Officer is the Accountable Executive (AE), accountable for the safety of tailings facilities and avoiding or minimising the social and environmental consequences of a TSF failure.
- Responsible Person – At Sasa we have appointed a site-based Responsible Tailings Facility Engineer (RTFE), to ensure ownership and appropriate management of the TSFs. The RTFE consults with the Engineer of Record (EoR) and the AE, as well as the internal site teams. The RTFE is an appropriately qualified and experienced individual.

Why it matters?
Waste generated from our operations includes both mineral and non-mineral waste. Mineral waste is typically generated as a by-product of mineral extraction and is typically stored in tailings storage facilities (TSFs), which require responsible design, construction, operation and closure-management. We are conscious of the potential risks associated with the failure of our TSFs at Sasa, which could have far-reaching consequences for our operations, the environment and the communities surrounding Sasa. Without responsible management, waste has the potential to cause significant environmental harm and negatively affect the ecosystems and the local communities surrounding our operations.

Where our impact occurs:
- The Group
- Our supply chain
- Our local communities

Relevant policies:
- Environment Policy
- Tailings Policy

Reporting frameworks and Initiatives:
- GRI 306
- SASB 150a
- Global Industry Standard on Tailings Management (GISTM)

Relevant long-term targets:
- Maintain/achieve GISTM conformance for all TSFs, including the dry-stack tailings (DST)
- 70% of tailings to be stored in a more environmentally responsible manner by 2026

Associated SDG's:

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CARING FOR THE ENVIRONMENT

- Engineer of Record – an independent and appropriately qualified, experienced and licensed EoR. The EoR has responsible charge over the design of the facility and provides ongoing support.
- Additional elements ofTSF safety include continuous monitoring through CCTV and an automated real-time system (Cyclops), monthly reviews by an Independent Tailings Engineer, and oversight by the TSF Stability Committee. We engage third-party experts for TSF closure design to ensure long-term stability, and apply Trigger Action Response Plans (TARPs) to support early warning and incident prevention. Sasa has also developed Emergency Preparedness and Response Plans in consultation with local authorities, and installed an early warning system operated in partnership with the Crisis Management Centre.

Non-mineral waste

Hazardous waste management

Our waste is classified as hazardous or non-hazardous based on its properties in accordance with approved waste classification lists and national regulations. If classification is unclear, accredited third-parties are engaged to assess and classify the waste based on its characteristics .
Hazardous waste includes laboratory chemical packaging, flotation process waste (eg tailings), hydrocarbons, lubricants, oily rags, used PPE and batteries.
Risk assessment for hazardous material and their disposal is integrated into our broader environmental and operational risk management processes. Assessments are conducted using Safety Data Sheets (SDS), available data and internal procedures, which form an integral part of our ESIA and regulatory permitting process. Identified impacts are addressed in our Waste Management Plans and Standard Operating Procedures (SOPs).
Hazardous materials are handled and stored in accordance with the relevant SDS, procedures and risk assessments. Non-mineral hazardous waste is stored in appropriate containers in designated storage areas until it is collected by licensed companies and, where possible, waste is processed and cleaned to allow the materials to be recycled.

Non-hazardous waste management

Non-hazardous waste predominantly includes communal waste, used tyres, scrap metal, packaging , bottles, batteries and paper materials. In line with national regulations, it is sorted and temporarily stored in designated waste containers or external disposal sites until it is removed by a licensed company for further treatment. Wherever possible, CAML works with waste contractors that have recycling initiatives. Kounrad sends a higher proportion of waste to licensed landfill than Sasa. However, the local landfill in Balkhash has taken initial steps to separate its waste, with a portion now recycled by local companies.
The most significant non-hazardous waste produced at Kounrad is ash from coal combustion. Through an industrial symbiosis approach, the ash is reused by the local community in brick production for construction and insulation, significantly minimising waste disposal on site.

Ensuring an effective approach

Monitoring, measurement, analysis and evaluation are central to the EMS at our operations, and to CAML's broader environmental strategy. This includes hazardous material handling, waste generation and recycling. Regular internal inspections are carried out to assess environmental performance and external inspections, with periodic audits as required by local regulations.

We set external environmental targets and integrate internal objectives into annual remuneration reviews. By monitoring performance against these targets, integrating environmental objectives into decision-making, and regularly auditing our EMS, we maintain a robust and adaptable management system.
Our TMS is also regularly audited, with results reported to the Accountable Executive (CAML's CEO) and the Board. Our monitoring systems are robust and operate in real time, enabling continuous oversight of TSFs. At Sasa, an early warning system has been installed in collaboration with the Crisis Management Centre.

To support transparency and accountability, we have an independent whistle-blowing hotline and anonymous submission boxes at our operations, allowing employees to raise any tailings management concerns.

CAML publicly reports data and information on waste, including tailings management, in its Sustainability Report and publishes an annual GISTM Public Disclosure document, found here: https://www.centralasiametals.com/sustainability/environment/tailings/

Responsibility and accountability

CAML's Board has ultimate accountability for the Group's approach to waste and tailings management, supported by the Sustainability Committee. The Board and Committee are kept regularly informed of relevant matters during quarterly meetings.

The CEO holds overall executive responsibility and serves as the Accountable Executive (AE) for tailings management, in line with the Global Industry Standard on Tailings Management (GISTM). The CEO is supported by Deputy AEs. Tailings oversight is provided by the DAE–Corporate and DAE-Site, and responsibility for non-mineral waste lies with the Head of Sustainability and the operations' general directors. Site-level teams are responsible for day-to-day implementation across both areas.

The diagram below shows the organisational structure for managing our TSFs.