

China Molybdenum Co., Ltd. Environmental Policy

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Approver: Chaochun Li

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Chapter 1 Purpose and Scope

The purpose of this Environmental Policy (the "Policy") is to help ensure compliance by China Molybdenum Co., Ltd. ("Group") and all of its directly or indirectly controlled or majority-owned subsidiaries (collectively, "CMOC") with applicable environmental laws and regulations. At CMOC, our environmental performance is essential to our business success. As an international organization with facilities in multiple countries, communities and environments, we recognize the responsibility we have to conduct our business and deliver our products in a manner that is consistent with our corporate values. Accordingly, this Policy applies to the operations of all CMOC companies across the globe.

Chapter 2 Our Commitment

CMOC is committed to maintaining compliance with applicable environmental laws and regulations as well as continuously improving of our environmental management systems. This commitment drives us to identify and consider new opportunities for pollution prevention and minimize the impact of our operations on the environment. We ensure the integration of sound environmental practices in our day to day activities and long-term business management and strategy.

CMOC fulfills this commitment by:

- 1. Communicating these commitments to employees, contractors and suppliers of goods and services;
- Requiring contractors and suppliers of goods and services to comply, as appropriate, with the requirements of this Policy;
- 3. Engaging with stakeholders at all levels regarding our environmental performance;
- 4. Maintaining active grievance management and resolution processes to address community complaints;
- 5. Applying a risk management system based on sound science to identify and evaluate environmental impacts;
- 6. Pursuing where practicable energy efficiency, use of renewable energy sources and recycling of materials;
- Conducting environmental audits of our operations as part of a system of continuous improvement, and taking timely corrective action as required;
- 8. Identifying locations of potential environmental sensitivity, such as areas of high biodiversity value, and developing best practice mitigation strategies to avoid or reduce impacts on those locations;
- 9. Assessing and endeavoring to reduce potentially adverse effects of our activities on the environmental and cultural value of an area in addition to the socio-economic benefits of resource development;
- 10. Considering opportunities to use new technologies, advancement of scientific knowledge and the sharing of our own experience; and

11. Monitoring and managing environmental aspects to proactively mitigate impacts to our employees, communities and surrounding environment.

Some of our operations are located in developing economies, where our environmental management programs not only comply with local, applicable law, but also refer to international best practice frameworks such as those of the International Finance Corporation and the sustainable development principles of the International Council on Mining and Metals.

Chapter 3 Effectiveness and Interpretation

This Policy shall come into force on the date of signing by the Chairman of the Group and its promulgation.

If any policy previously issued by CMOC conflicts with this Policy, this Policy shall prevail.

This Policy shall be interpreted by the Legal and Compliance Department of the Group.