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Corporate Social Responsibility (CSR) Policy

Identification number POL.000.023
In force from 18.05.2026



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Short description

Corporate Social Responsibility (CSR) reflects the commitment of DPTU “Bucim” DOOEL Radovich to contributing to the sustainable development and well-being of the communities in which it operates. This Policy, as an integral part of the Solway Group's sustainability framework, sets out the principles, priorities and processes for planning, approving, implementing and monitoring corporate social investments. Its purpose is to ensure that CSR activities create long-term, sustainable value for local communities while contributing to the responsible and stable operation of the Company.



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1 | Policy Statement

DPTU “Bucim” DOOEL Radovish, as part of the Solway Group, operates in line with the Group's mission of responsible production, sustainable management of natural resources, and value creation for society, contributing to the transition toward a more sustainable and inclusive economy.

In this regard, the Company is committed to creating long-term, sustainable and measurable value for the communities in which it operates. The Corporate Social Responsibility (CSR) programme is a systematic and transparent framework through which, in partnership with local stakeholders, initiatives are identified, planned and supported that contribute to improving quality of life and fostering sustainable development.

Through strategically targeted and responsibly managed CSR initiatives, DPTU “Bucim” DOOEL Radovish supports projects of public interest with long-term positive impact, which contribute to local economic and social development and to strengthening social cohesion.

2 | Objectives

The purpose of this Policy is to ensure that the Company's Corporate Social Responsibility (CSR) activities are planned and implemented in a transparent, responsible and systematic manner.

This Policy establishes:

- a clear governance framework, roles and responsibilities for CSR activities
- criteria and procedures for planning, selecting and approving initiatives and projects
- a system for monitoring, evaluating and reporting on the results and impact of implemented CSR activities

This ensures that the activities contribute to creating shared value for the Company and for the communities in which it operates, through a long-term and sustainable approach.

3 | Scope of Application

This Policy applies to all Corporate Social Responsibility (CSR) activities of DPTU “Bucim” DOOEL Radovish, including initiatives, projects and partnerships aimed at supporting sustainable development and the well-being of communities.

This Policy is aligned with the principles, standards and guidelines for sustainable management established by the Solway Group and provides a framework for their practical implementation in the Company's operations.

In implementing this Policy, the Company consistently complies with the applicable laws and regulations of the Republic of North Macedonia, as well as the relevant internal policies and standards of the Group. Activities carried out in the form of donations and sponsorships are implemented in accordance with applicable legal regulations.

In the event of inconsistency between the provisions of this Policy and national regulations, the stricter requirements shall apply.

This Policy is reviewed periodically and updated as needed, in order to remain aligned with legal requirements, Group standards, and best practices in the field of corporate social responsibility.

4 | Additional Applicable Documents

The implementation of this Policy takes into account the relevant policies, standards and internal instruments of the Solway Group, as well as the internal documents of DPTU “Bucim” DOOEL Radovish, including, but not limited to:

- Solway Group Code of Conduct.
- Solway Group Sustainability Policy.
- Solway Group Sustainability Management Standards.
- Solway Group Policy on Charitable Donations and Sponsorships.
- Solway Group Policy on Third-Party Management.
- Solway Group Conflict of Interest Policy.
- Solway Group Anti-Bribery and Anti-Corruption Policy.

5 | Our Approach to CSR

5.1. Background and Context

In line with the principles and policies established by the Solway Group, corporate social responsibility is based on the understanding that the Company's business activities are inseparably linked to the communities in which it operates.

DPTU “Bucim” DOOEL Radovish applies this approach, recognizing that its operations are closely tied to local infrastructure, institutions, partnerships and community support. At the same time, the communities and regions in which the Company operates rely on it as a significant economic actor that provides employment, generates economic activity and contributes to local development.

Through its corporate social responsibility activities, the Company systematically addresses the mutual impacts between its business operations and host communities. In this regard, creating shared value and building long-term trust and acceptance from local communities and stakeholders represent a key precondition for stable,

responsible and long-term sustainable operations.

5.2. Approach and Focus of CSR

The Corporate Social Responsibility (CSR) activities of DPTU “Bucim” DOOEL Radovish are aimed at the long-term strengthening of communities, supporting sustainable development, and enhancing social cohesion in the host communities and regions in which the Company operates.

The direction and content of CSR activities are determined based on the needs and challenges of the communities, as well as in line with the Company's business priorities and capabilities. By aligning these aspects, the Company seeks to create shared value for the community and for its own sustainable and responsible operations.

In line with this approach, priority is given to initiatives that address significant and insufficiently covered needs, i.e., activities that have limited prospects of being realized without the Company's support, or where its contribution can result in a significant positive and long-term impact.

DPTU “Bucim” DOOEL Radovish recognizes trust and acceptance from local communities as an important precondition for long-term, stable and responsible operations, and strives to be a reliable, long-term and active partner to the communities in which it operates, by building and maintaining relationships based on trust, transparency and mutual value with local communities and stakeholders.

In this regard, CSR resources are directed toward a carefully selected number of initiatives where the Company's engagement can create significant and sustainable value, rather than being spread across a large number of activities with limited impact.

5.3 Priority Areas

The priority areas for Corporate Social Responsibility (CSR) are aligned with the mission, values and principles of the Solway Group, as well as with the sustainable development goals of DPTU “Bucim” DOOEL Radovish.

Within this approach, the Company focuses on a limited number of initiatives with the potential for significant and long-term impact, which contribute to community development, education, health, well-being, the environment, and local development.

The priority areas for CSR are defined in Annex A of this Policy.

5.4 General Principles

DPTU “Bucim” DOOEL Radovish recognizes that social and environmental challenges are complex and that not all initiatives can be addressed through the Company's activities, nor can the Company be a suitable partner for every individual initiative.

For this reason, the Company applies a selective and strategic approach when identifying and supporting Corporate Social Responsibility (CSR) initiatives. This approach is aimed at the optimal use of resources and focusing them on activities where the Company can contribute relevant expertise, partnership and support, in order to achieve a significant and sustainable positive impact.



In this regard, the Company directs its activities toward initiatives where its involvement creates real added value, through an integrated approach that goes beyond purely financial support.

CSR activities are guided by the following principles:

Principle	Description
Needs-Based	CSR activities are based on clearly identified needs of host communities and relevant aspects of the Company's business activities. Support decisions are based on an analysis of the local context, consultations with stakeholders, and available relevant data.
Strategic Alignment	CSR activities are aligned with the Company's business strategy, its sustainable development goals, and the priorities of the Solway Group.
Efficient Use of Resources	CSR activities are planned and implemented through the rational, responsible and transparent use of financial resources and other available resources.
Sustainability	The Company supports initiatives that create long-term benefits and have the potential to continue after the support ends, particularly through strengthening local capacities.
Local Involvement and Capacity Building	Priority is given to initiatives that encourage active participation of the local community, the development of local institutions, and the building of sustainable capacities.
Partnerships with Stakeholders	The Company establishes and develops cooperation with public institutions, educational establishments, civil society organizations and other relevant partners, with the aim of achieving shared and sustainable results.
Ethics and Compliance	CSR activities are carried out in accordance with the Company's values, internal policies and applicable legal regulations. Activities implemented as donations or sponsorships are carried out in accordance with the relevant legal framework.
Measurable Impact and Accountability	Appropriate indicators are established for CSR activities to monitor results and impact. The Company ensures regular monitoring, evaluation and transparent reporting.

5.5 Integrity and Compliance

DPTU "Bucim" DOOEL Radovish carries out its activities in accordance with the principles of integrity, trust and transparency set out in the Group's values, the Code of Conduct, and relevant compliance policies, in particular the Group's Compliance Policy on Charitable Donations and Sponsorships.

Procurement and third-party management policies and procedures apply equally in the context of Corporate Social Responsibility (CSR) activities.

In implementing CSR activities, the Company applies a careful and selective approach when choosing partners and initiatives, with the aim of supporting activities of public interest without creating personal or private benefits.

CSR activities may not be used to support:

- activities aimed at private or personal benefits for individuals;
- political parties, political organizations, or individuals with political or party affiliation;
- military, paramilitary or police organizations;
- organizations or activities in which an employee of the Solway Group or the Company may be a direct or indirect beneficiary, due to a potential conflict of interest,

unless this has been appropriately reviewed and approved in accordance with the compliance procedures;

e) covering operating costs, travel expenses, or debt repayment of the recipient organization.

Exceptions to the above restrictions may only be considered in justified cases and are subject to appropriate approval by the competent CSR body. Such exceptions may relate to:

- a) sponsorship of events in exceptional circumstances;
- b) assistance activities in emergency or humanitarian situations;
- c) limited projects of local significance;
- d) activities of religious or faith-based organizations that have the capacity to implement projects of public interest and are open to the wider community;
- e) other cases approved by the competent local CSR body and, where applicable, by the relevant Group function.

Contributions or membership fees for trade, business or professional associations, as well as other forms of membership, are not considered CSR activities.

5.6 Budget and Funding Obligations

In accordance with the principles of the Solway Group and the applicable legal regulations in the Republic of North Macedonia, DPTU “Bucim” DOOEL Radovish provides financial resources for implementing Corporate Social Responsibility (CSR) activities through annual budget planning and management.

The Company undertakes to:

- establish and manage an annual CSR budget, determined and approved as part of the regular budget planning process and in accordance with the Group's internal policies and procedures;
- provide continuous and responsible financial support for approved CSR activities, including in cases of multi-year commitments undertaken;
- support initiatives with the potential for long-term sustainability;
- implement donations and sponsorships in accordance with applicable legal regulations, when CSR activities are carried out in that form;
- conduct appropriate due diligence (due diligence) on recipients and key partners prior to approval.

Prior to approval, every recipient and key partner is subject to an integrity check, which includes an assessment of ownership structure, related parties, possible conflicts of interest, corruption risk, and reputational risk. If elevated risk is identified, approval is granted on the basis of a reasoned decision and the application of additional control measures, in accordance with internal compliance procedures.

When the Company makes use of tax incentives under the Law on Donations and Sponsorships in Public Activities, the donation or sponsorship is carried out on the basis of a contract and with appropriate supporting documentation, in accordance with the requirements of the competent institutions.

The budget for CSR activities is planned and approved as part of the Company's regular

annual budget planning process.

The approval process involves appropriate management structures and relevant functions, in order to ensure transparent, controlled and compliant management of funds allocated for CSR.

6 | Governance and Processes for Corporate Social Responsibility (CSR)

6.1. Awareness Raising and Access to the Programme

DPTU “Bucim” DOOEL Radovish ensures that relevant stakeholders are informed in a timely and transparent manner about the Corporate Social Responsibility (CSR) programme, its purpose, the conditions for participation, the decision-making criteria, and the application procedure.

These conditions include:

- compliance with the priority areas defined in Annex A;
- adherence to the integrity principles and restrictions set out in Section 5.5;
- compliance with the application, review and approval procedures set out in Sections 6.3 and 6.4.

Requests for financial support under CSR are submitted in writing through a formalized application process, either by email, by postal delivery, or directly through the Company's official website, by submitting a request via the designated form for donations and sponsorships.

All applications are reviewed in accordance with the criteria and principles set out in this Policy.

6.2. Governance

In order to ensure efficient and transparent governance of Corporate Social Responsibility (CSR) activities, DPTU “Bucim” DOOEL Radovish establishes a Sustainable Development Committee, which coordinates, directs and oversees the implementation of initiatives in this area.

The Sustainable Development Committee is composed of representatives of the Company's management, namely:

- General Director
- Deputy General Director
- Director of Sustainable Development and Communications
- Assistant General Director for Control, Financial Oversight and Reporting

The Sustainable Development Committee is responsible for:

- determining guidelines and priorities for planning and implementing CSR activities;
- reviewing and approving proposals for initiatives and projects;
- approving and overseeing the use of the budget allocated for CSR;
- monitoring, assessing and guiding implementation and the results achieved;

- ensuring appropriate recording, monitoring and reporting of activities to the Group;
- reviewing and approving information related to public communication and reporting.

6.3. Funding Application

DPTU “Bucim” DOOEL Radovish establishes a clear and transparent procedure for submitting and reviewing requests for support under the CSR programme

All interested organizations or institutions applying for financial or other forms of support are required to submit a written project proposal in accordance with the established application procedure.

The funding application must contain at least the following information:

- Identification of the Need – a description of the problem or need the project aims to address, based on relevant data or analysis, where applicable;
 - Project Description – a brief overview of the proposed initiative, its purpose, and the planned activities;
 - Objectives and Expected Results – clearly defined project objectives, expected results and potential social impact, with possible quantitative or qualitative indicators for measuring the results achieved;
 - Project Structure and Partners – information about the applicant organization and any partners involved in implementing the project, including their capacity and role in implementation;
 - Budget and Financial Plan – an estimate of the required financial resources, including the amount of support requested, the funding timeline, and possible co-financing sources, where applicable;
 - Implementation Plan – a timeline for implementing the project activities;
 - Monitoring and Evaluation – proposed methods and indicators for monitoring project implementation and measuring its social impact;
 - Reporting – a description of how the applicant will ensure regular reporting on the project's progress and results.
 - Sustainability and Transfer of Activities – where applicable, the application should include information on the project's long-term sustainability, as well as the possible approach for phasing out, local takeover, or transfer of activities to the community, institutions, or other relevant stakeholders after the Company's support ends.
- Submitted applications are reviewed in accordance with the criteria and principles set out in this Policy, as well as the available CSR budget.

6.4. Review and Approval Process

DPTU “Bucim” DOOEL Radovish establishes a structured and transparent process for reviewing and approving requests for support under the CSR programme. The review and decision-making process is carried out in accordance with the established application procedure, the criteria defined in this Policy, and the authority of the Company's management structures.

Submitted applications are reviewed by the competent departments and assessed based on their alignment with the priority areas, expected social impact, sustainability

of the proposed activities, and the available budget for corporate social investments. If a project or initiative is approved, the Company concludes an appropriate agreement with the recipient organization. Agreements for CSR initiatives are prepared in accordance with the Company's applicable internal policies and procedures, including relevant rules on procurement and third-party management. Such agreements generally include:

clearly defined project objectives and activities;

- an established timeline and key implementation milestones;
- the parties' obligations regarding the use of funds;
- the Company's right to monitor and audit the implementation of the project;
- an obligation for regular reporting on the project's progress and results;
- other standard contractual terms in accordance with the Company's internal policies and procedures.

7 | Monitoring and Reporting

7.1. Monitoring and Evaluation Process

DPTU "Bucim" DOOEL Radovish establishes and applies effective processes for monitoring and evaluating the financial and non-financial performance of funded CSR initiatives, including defined indicators appropriate for measuring their success.

The Company establishes a procedure for the continuous monitoring and evaluation of projects, both during their implementation and after their completion, in order to ensure their alignment with the defined objectives and tasks, as well as their sustainability.

The areas of monitoring and evaluation include:

Monitoring of Performance (Efficiency)	Area	Definition of the problem within the scope of the project. Rationale based on the Shared Value approach.
	Inputs	Resources required to implement the programme, including staff, infrastructure, financial investment, and time allocation.
	Activities	Specific processes and activities carried out to achieve the defined objectives of the programme.
	Outputs	Quantitatively measurable results or the scope of activities carried out as a direct result of implementing the programme.
Evaluation of Results (Effectiveness)	Results	Expected results showing how the programme addresses the identified problems and creates impact. The changes that occur as a result of the implemented activities, namely: Long-term results – ultimate goals reflecting sustainable positive change; Medium-term results – gradual improvements contributing to long-term success; Short-term results – immediate and expected changes.

7.2. Reporting

Internal Reporting

DPTU “Bucim” DOOEL Radovish establishes and maintains a centralized database for all CSR initiatives.

The database is maintained by the Sustainable Development Department, in coordination with the relevant organizational units, and must contain at least:

- name of the project/initiative;
- partner/recipient;
- approved budget and disbursements made;
- implementation status;
- relevant documentation and evidence of implementation.

The Company ensures regular updating, accuracy and completeness of the data, as well as its compliance with internal procedures and Group requirements.

External Reporting

The total amount of funds allocated for CSR activities by DPTU “Bucim” DOOEL Radovish is included in the Group's Annual Report and Sustainability Report.

This data may be subject to external audit and is also included in monthly business and sustainability reports.

The Group's publicly available Sustainability Report may include a more detailed overview of CSR activities, including the breakdown of costs by category and region, based on data submitted and confirmed by the Company.

External communication, including press releases, social media posts, and other forms of communication related to CSR activities, is coordinated and approved in accordance with internal rules and applicable communication policies.

7.3. Annexes

Annex A: CSR Priority Areas / Donations and Sponsorships

Priority Area	Description
Social Support and Inclusion	Support for humanitarian activities, assistance to vulnerable categories of citizens, and initiatives for social inclusion and equal opportunities, including support for persons with disabilities and projects to improve quality of life.
Education, Youth and Talent Development	Support for education and youth development through scholarships, donations to schools, practical training, and educational programmes, aimed at strengthening the knowledge, skills, and potential of young people.
Health, Sport and Well-being	Support for health-related initiatives, including medical equipment, health campaigns, and healthy nutrition activities, as well as sports clubs, events, and recreational activities that promote a healthy lifestyle.
Culture, Art and Cultural Heritage	Support for cultural and artistic activities, including exhibitions, concerts, and events, as well as initiatives for preserving cultural heritage, tradition, and local identity.
Environment	Support for environmental protection activities, such as reforestation, clean-up campaigns, eco-education, and local environmental projects, aimed at raising environmental awareness and promoting sustainable resource management.
Local Development and Infrastructure	Support for initiatives to improve local infrastructure and living conditions, including public spaces, roads, water supply, and lighting, as well as activities that contribute to local economic development.
Volunteerism and Civic Activism	Support for non-governmental organizations, volunteer initiatives, and activities that foster civic engagement, solidarity, and active participation in the community.
Safety and Prevention	Support for initiatives to enhance safety, including road safety, civil protection, and first aid training, aimed at reducing risks and protecting the community.
Professional Events and Conferences	Support for participation in and organization of professional conferences, symposia, and forums that contribute to knowledge exchange, professional development, and the advancement of expertise.

Annex B: Definitions

Term	Definition
Sponsorship	Voluntary financial support, or the provision of goods or services, for a specific project or activity, whereby the provider obtains a direct benefit, such as the promotion of a name, brand, or trademark, in accordance with applicable legal regulations.
Corporate Social Responsibility (CSR)	A strategic and integrated approach through which the Company voluntarily invests funds, knowledge, and resources in activities that contribute to sustainable development, community well-being, and the creation of long-term positive social impact.
Social Benefit	Benefits for the community arising from projects or activities in areas such as education, health, the environment, infrastructure, and social support.
Donation	Voluntary and unconditional support in the form of money, goods, or services, which does not create a direct benefit for the provider or an obligation of repayment by the recipient, in accordance with applicable legal regulations.
Humanitarian Contribution	A type of donation aimed at supporting vulnerable groups, health needs, crisis situations, or other activities of public interest.
Community Trust and Acceptance	The level of trust, acceptance, and support shown by the local community and stakeholders toward the Company's activities.
Stakeholders	All persons, groups, or organizations that may be affected by the Company's activities or that have the ability to influence its operations.
Shared Value	An approach through which the Company creates economic value in a way that simultaneously creates value for society, by addressing social challenges.

8 | Change History

Date	Version	Description of Change
18.05.2026	1.0	Creation

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