

Buchim and Borov Dol Policy Charitable Donations and Sponsorships

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СОДРЖИНА

Purpose	3
Objectives	3
Scope	3
Additional Applicable Documents	4
Charitable Donations and Sponsorships.....	4
Charitable Donations	4
Sponsorships	5
Approval Requirements	5
Mandatory Record Keeping	5
Requests for Donations or Sponsorships.....	5
Transparency	6
Definitions	7
Change History	7

Purpose

The Companies always conduct their business fairly and prohibit all forms of corruption. Charitable donations are part of the commitment of the Group and the Companies to the communities in which they operate.

This Policy establishes the principles and rules governing the anti-bribery and anti-corruption aspects of charitable donations and sponsorships.

Objectives

As good corporate citizens, the Companies are committed to partnering with local communities to support their socioeconomic development. This commitment is essential to supporting our long-term business success and extends beyond our core operations and production. One element of this partnership may include providing donations or sponsorships.

The purpose of this Policy is to prevent any form of bribery and corruption through charitable donations and sponsorships by establishing:

Principles and anti-bribery and anti-corruption criteria for charitable donations; and

Record-keeping and reporting requirements for charitable donations and sponsorships.

Scope

This Policy applies to all business activities and subsidiaries of Solway Investment Group globally, across all geographic areas, and will be reviewed regularly to accommodate changes in external and internal factors that may affect our exposure to bribery and corruption risk or other relevant information that would warrant a review.

This Policy addresses only the anti-bribery and anti-corruption components of charitable donations and sponsorships. It forms an integral part of the donation and sponsorship approval process, as set out in the Buchim and Borov Dol Sustainable Development and Investment Policy and the related ESG policies and procedures.

The requirements of this Policy apply to all employees, managers and directors of the Companies.

This Policy applies to all businesses and subsidiaries in which Solway Investment Group has ownership or management control; where Solway Investment Group does not have management control, we will seek to influence the adoption of these Policy requirements.

Additional Applicable Documents

- Solway Investment Group Code of Conduct
- Policy: Buchim and Borov Dol Environmental, Social and Governance Policies and Procedures
- Policy: Buchim and Borov Dol Corporate Social Responsibility Policies and Procedures
- Policy: Buchim and Borov Dol Anti-Bribery and Anti-Corruption Policy
- Policy: Buchim and Borov Dol Third-Party Management Policy
- Other Buchim and Borov Dol anti-bribery and anti-corruption policies and procedures
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Charitable Donations and Sponsorships

Charitable Donations

Charitable donations are part of Buchim and Borov Dol's social commitment in the communities connected with our activities and supply-chain partners. Buchim and Borov Dol support a range of organizations through charitable donations, in-kind contributions and the personal commitment of their employees. However, charitable donations may also present corruption or reputational risks.

Therefore, donations must never be associated with an intention to influence a decision for the benefit of Buchim and Borov Dol or to obtain an unfair business advantage. This must be ensured prior to approval. In this context, it may be necessary to verify the reputation of the recipient charitable organization in order to avoid any potential conflict of interest or damage to the reputation of Buchim and Borov Dol.

Buchim and Borov Dol prohibit donations to:

- Individuals,
- Political parties or candidates for office, or
- Commercial or other for-profit organizations.

The reputation and integrity of all donation recipients must be reviewed in advance. Donations must comply with all internal rules or guidelines of the recipient organization. The provisions of the Group Policy on the Use and Retention of Third Parties must be observed. Payments must be made only to the bank account of the approved recipient as specified in the written agreement.

Special caution is required if the recipient has direct or indirect decision-making authority over an anticipated or pending decision that may affect the interests of Buchim and Borov Dol. Such cases must be reviewed and approved by the Global Compliance Leadership Team (GCLT), which may be contacted by email at: cco@solway.ch



Sponsorships

Buchim and Borov Dol sponsor selected events as part of promoting the Buchim and Borov Dol brand and enhancing the company's image. However, sponsorship may present a corruption risk. Sponsorships must never be associated with an intention to influence a decision for the benefit of Buchim and Borov Dol or to obtain an unfair advantage. This must be ensured in advance.

Each sponsorship must comply with any internal rules or guidelines of the recipient organization and must be contractually agreed in writing in advance, specifying the amount of the contribution, the recipient and the intended purpose of the sponsorship contribution. Payments must be made only to the account of the approved recipient as specified in the written agreement.

The provisions of the Group Policy on the Use and Retention of Third Parties apply.

Approval Requirements

All charitable donations and sponsorships must be approved in accordance with the Buchim and Borov Dol Corporate Social Responsibility Policy and Procedures and the Buchim and Borov Dol Third-Party Management Policy.

Each donation or sponsorship proposal is subject to a risk assessment using a standardized form covering: purpose, recipient, amount, possible conflicts of interest, and compliance with the anti-corruption policy. The risk assessment is carried out by the person responsible for compliance.

Mandatory Record Keeping

All charitable donations and sponsorships must be recorded in the Solway Investment Group subsidiary where the donations or sponsorships are made, in accordance with the Buchim and Borov Dol Corporate Social Responsibility Policy and Procedures and with an appropriate level of detail.

All charitable donations and sponsorships must be properly recorded in the Subsidiary's books and records together with all supporting documentation.

Each Solway Investment Group subsidiary reports all charitable donations and sponsorships to the ESG Committee once a year.

Requests for Donations or Sponsorships

Where a public official or another person or stakeholder requests a donation or sponsorship from Buchim and Borov Dol, it must always be assessed whether this is an attempt to improperly influence a pending decision in favor of Buchim and Borov Dol's business and therefore constitutes bribery.

If an employee considers the request to be an improper solicitation, it must be refused immediately.

In addition, any such solicitation or attempted solicitation must be reported immediately to the GCLT, followed by a report to the Committee.

Any employee who receives a suspicious request for a donation must immediately submit an internal report to the Compliance Officer via a form or email. No response may be given before written approval is obtained.

Transparency

The Company publishes an annual report listing approved donations and sponsorships, in accordance with the principles of transparency and responsible governance.



Definitions

Term	Definition
Charitable donations	Donations are contributions made by Buchim and Borov Dol to support charitable purposes without expecting anything in return. Donations may be made in cash or in kind, including goods or services. In-kind contributions may include product donations and volunteer work by Buchim and Borov Dol employees. Membership fees in social and charitable organizations are also considered donations.
Public official	All employees of governments, ministries, authorities or other quasi-governmental agencies such as the United Nations, the World Bank, etc. This also applies to close family members such as spouses or children, and to candidates for public offices or roles.
Sponsorship	Sponsorship is a direct or indirect financial contribution to a specific event or series of events organized by a third-party organization for the purpose of promoting the Buchim and Borov Dol brand or reputation. Sponsorships are made in exchange for the right to associate the image, brand or products of Buchim and Borov Dol with an event, activity or organization.
Risk and Compliance Committee (RCC or the Committee)	The management and approval body responsible for the matter concerned and for reporting the actions taken to the Board of Directors of Solway Investment Group.
ESG Committee	A management and approval body responsible for monitoring, evaluating and guiding the company's activities and strategies regarding environmental, social and corporate governance matters, and responsible for the matter concerned and actions taken before the Board of Directors of Solway Investment Group.
Global Compliance Leadership Team (GCLT)	A group within the organization responsible for overseeing and leading compliance-related efforts and comprising the entire network of compliance officers of the Group and subordinate companies (asset level) as a single entity (team).

Change History

Date	Version	Description of change
22.10.2024	1.0	Creation
12.11.2025	2.0	Content amended in sections 5.3 and 5.6; Cover page changed.