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Sustainable Development Policy

Identification number POL.000.024
In force from 18.05.2026



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Short description

This Policy sets out the principles and guidelines for the sustainable management of the business activities of DPTU “Bucim” DOOEL Radovish in the areas of occupational health and safety, environmental protection, and community relations. In line with the Group's sustainability management standards, this Policy establishes a framework for the responsible management of operations and for the continuous improvement of sustainable development performance.



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1 | Policy Statement

The Sustainable Development Policy sets out the fundamental principles, mandate, and obligations of DPTU “Bucim” DOOEL Radovich in managing matters related to occupational health and safety, environmental protection, community relations, and other relevant aspects of sustainable operations.

This Policy defines the strategic priorities and guidelines for the responsible management of our business activities, with the aim of ensuring the Company's sustainable development and a positive impact on the environment, employees, and the local community.

The principles and obligations set out in this Policy are aligned with the Group's 16 sustainability management standards, as well as with other relevant internal policies, principles, and applicable legal requirements.

This Policy is communicated internally to all employees and externally to relevant stakeholders, and is publicly available on the website of DPTU “Bucim” DOOEL Radovich.

2 | Objectives

The purpose of this Policy is to ensure the systematic and responsible management of sustainability-related risks, opportunities, and impacts in the operations of DPTU “Bucim” DOOEL Radovich.

This Policy establishes a framework for:

Defining the key obligations of DPTU “Bucim” DOOEL Radovich in the areas of sustainable development;

- Establishing minimum requirements and standards for managing impacts on the environment, occupational health and safety, employees, the community, and other relevant ESG topics;
- Providing a basis for responsible and sustainable management of all business activities, operations, and processes of the Company.

3 | Scope of Application

This Policy applies to all business activities, organizational units, and operations of DPTU “Bucim” DOOEL Radovich.

The Board of Directors of the Solway Group, through the Sustainable Development Committee, oversees the sustainability programme, including its development, implementation, and continuous improvement. The objectives and obligations related to sustainable development are approved and supported by the Board of Directors and are implemented by executive and operational management at all levels of the

organization.

This Policy and its related procedures are regularly reviewed and updated to ensure their alignment with changes in legislation, strategic priorities, business activities, and other relevant internal and external factors that may affect the Company's sustainability performance.

This Policy applies to all directors, managers, employees, and other persons acting on behalf of DPTU “Bucim” DOOEL Radovich. Employees are expected to comply with the principles and requirements set out in this Policy and to actively contribute to their implementation in day-to-day operations.

The provisions of this Policy, where applicable, also apply to business partners, contractors, subcontractors, and suppliers involved in the Company's activities. The Company will, through contractual relationships and cooperation, seek to encourage these parties to respect the principles of sustainable and responsible business conduct.

4 | Additional Applicable Documents

This Policy is implemented in accordance with the following Solway Group documents, which also apply to the operations of DPTU “Bucim” DOOEL Radovich:

- Code of Conduct;
- POL.000.025 Policy on Sustainable Development Management Standards;
- POL.000.001 Human Rights Policy;
- POL.000.023 Corporate Social Responsibility (CSR) Policy;
- POL.000.006 Third-Party Management Policy;
- POL.000.002 Policy on Charitable Donations and Sponsorships;
- POL.000.026 Terms and Definitions – Sustainable Development Reporting.

5 | Elements of the Sustainability Policy

5.1. Compliance and Alignment with Standards

The Solway Group, of which DPTU “Bucim” DOOEL Radovich is part, operates with a high degree of integrity and is committed to complying with all relevant legal and regulatory requirements.

In line with the Group's principles and standards, DPTU “Bucim” DOOEL Radovich aligns its sustainability activities and requirements with internationally recognized standards, principles, and conventions, including those established by the



International Finance Corporation (IFC), the International Labour Organization (ILO), the International Council on Mining and Metals (ICMM), as well as the Towards Sustainable Mining (TSM) initiative of the Mining Association of Canada. These principles form the basis for advancing responsible and sustainable management of the activities of DPTU “Bucim” DOOEL Radovich, with particular focus on environmental protection, occupational health and safety, respect for human rights, and a responsible approach toward the local community.

5.2. Governance

Our commitment: DPTU “Bucim” DOOEL Radovich, in line with the principles and standards of the Solway Group, is guided by generally accepted principles of responsible corporate governance, ensuring management and control oriented toward values and the Company's sustainable development. As part of this commitment, the Company:

- Maintains strong corporate governance practices, through responsible leadership, a clear allocation of management responsibilities, and effective management of sustainability-related risks;
- Continuously identifies, assesses, and manages sustainability-related risks, with the aim of strengthening the resilience of the Company's operations to climate change, natural hazards, technical and operational hazards, and other significant events;
- Maintains high ethical standards in its operations, through the application of the Code of Conduct and Ethics, the delivery of ethics training, and the promotion of a culture of integrity and accountability;
- Establishes a clear governance structure for sustainability, with defined objectives, responsibilities, and mechanisms for monitoring sustainable development performance;
- Applies integrated management systems, based on internationally recognized standards (ISO standards), particularly in the areas of the environment, occupational health and safety, and quality;
- Ensures adequate capacity and competence for sustainability, in order to successfully implement our plans and achieve the objectives set.
- Establishes mechanisms for monitoring, evaluation, and reporting, with the aim of continuously improving sustainability performance and transparently informing stakeholders.



5.3. Health and Safety

Our commitment: DPTU “Bucim” DOOEL Radovich strives to provide a safe and healthy working environment in which risks of injury and negative health impacts are minimized. Our goal is to enhance the well-being of employees, contractors, and the communities in which we operate.

We:

- We embed a culture of health and safety within the Solway Group's operations, which actively contributes to the effective implementation of health and safety strategies and to achieving the objectives and commitments set in this area;
- We ensure that the health, safety, and security of employees, contractors, and communities remain our primary responsibility. We are committed to reducing the risk of adverse health effects in the working environment, through the establishment of standards, regular inspections of workplaces and working conditions, and the implementation of programmes to promote employee health and safety;
- We maintain a drug- and alcohol-free working environment. All employees are expected to be fit for work upon arrival at the workplace and while carrying out their duties. The use of alcohol, illegal drugs, or prescription medication that may affect the ability to work or the health and safety of others is prohibited;
- We assess the exposure of local communities to risks, cooperate with communities to better understand health-related needs and challenges, and establish appropriate programmes and monitoring and evaluation systems;
- We ensure that contractors are informed and adequately trained in health and safety practices, understand and comply with our requirements, and align their working practices with the health and safety management systems and programmes applied at DPTU “Bucim” DOOEL Radovich.

5.4. Fair Treatment and Equality in Employment

Our commitment: DPTU “Bucim” DOOEL Radovich values diversity, ensures an inclusive working environment, and treats all employees and contractors fairly. We ensure equal opportunities at all levels of the organization, without discrimination on the basis of race, nationality, religion, sex, age, sexual orientation, disability, political or other belief, or any other personal characteristic.

We:

- We recognize and respect the rights of our workforce, including the right to a safe working environment, the right to collective representation, fair and adequate compensation, job security, and opportunities for professional development;
- We evaluate employees and job candidates on the basis of their job-related skills, qualifications, and abilities. Employment, promotion, and development opportunities are based on merit and professional competence;
- We do not tolerate any form of discrimination, mistreatment, harassment, or physical violence in the workplace;



- We actively oppose any form of illegal employment and unfair labour practices, adhering to international labour standards and respecting human rights at all our locations;
- We encourage employees to report if they believe they have been treated unfairly, without fear of retaliation or negative consequences.

5.5. Responsible Environmental Management

Our commitment: DPTU “Bucim” DOOEL Radovish strives toward responsible environmental management, with the aim of protecting natural resources and continuously reducing the impact of its business activities and operations.

We:

- We carry out our business operations in a way that continuously reduces the impact on the environment, including waste management, air and water emissions, land use, and biodiversity protection, with the aim of conserving natural resources;
- We strive toward the responsible management of the natural environment and the preservation of the long-term stability and sustainability of the ecosystems affected by our operations;
- We apply the best available techniques that are economically achievable (BATEA) and strive to achieve emission levels that are “as low as reasonably practicable” (ALARP);
- We take into account the environmental and social impacts of our products throughout their entire life cycle, in order to provide products that contribute to sustainable development and to the transition toward cleaner energy sources;
- We systematically manage greenhouse gas (GHG) emissions in order to reduce CO₂ emissions, as well as to reduce carbon and energy intensity, using recognized methodologies and protocols for measurement and reporting;
- We implement measures for the efficient use of energy, natural resources, and materials, through their recovery, reuse, and recycling, where technically and economically feasible;
- We ensure transparency and traceability of sustainability aspects across the supply chain, so that our partners and stakeholders have a clear view of the impacts and performance related to materials and products along the value chain.

5.6. Human Rights

Our commitment: DPTU “Bucim” DOOEL Radovish, guided by its values and principles and in line with internationally recognized standards, respects and promotes human rights within its business activities and areas of influence. In doing so, we respect the cultural heritage, traditions, and rights of the individuals and communities with whom we interact.



We:

- We commit to respecting human rights, in accordance with the United Nations Universal Declaration of Human Rights;
- We apply the United Nations Guiding Principles on Business and Human Rights (UNGPs) within our business operations and activities;
- We respect the dignity, fundamental freedoms, and human rights of our employees, contractors, business partners, and the communities in which we work and live;
- We do not tolerate any form of discrimination, harassment, or violence, nor any form of child, forced, or compulsory labour;
- We respect the rights and interests of local communities, taking into account their needs, concerns, and expectations within our activities;
- We strive to ensure transparent communication and constructive dialogue with stakeholders, with the aim of informing and involving them in processes that may affect them.

5.7. Working with Partners

Our commitment: DPTU “Bucim” DOOEL Radovish builds and maintains mutually beneficial relationships with its business partners and strives to be a fair, reliable, and responsible partner. Through cooperation with partners, suppliers, and customers, we seek to develop efficient and sustainable supply chains.

We:

- We strive to be a fair and reliable business partner, building relationships based on trust, transparency, and mutual benefit;
- We select suppliers on the basis of transparent criteria and fair processes, respecting the principles of free and fair competition. Procurement and contracting decisions are based on the best value that can be obtained, taking into account price, quality, performance, competence, and the suitability of partners, as well as sustainability criteria;
- We encourage our contractors and suppliers to respect our values and principles, as well as to comply with applicable legal and regulatory requirements. Where applicable, we encourage them to apply good sustainable management practices within the supply chain;
- We strive to develop our business model in a way that ensures long-term sustainability and customer trust, by understanding and meeting their needs and expectations, including those related to sustainability;
- We communicate with government institutions, public officials, and international organizations with integrity, upholding the highest standards of professional and ethical conduct.



5.8. Stakeholder Relations

Our commitment: DPTU “Bucim” DOOEL Radovish builds open and transparent relationships with its stakeholders. Consultation and communication with stakeholders are essential for understanding their needs and interests, as well as for making informed decisions and developing effective and responsible cooperation.

We:

- We maintain open and constructive dialogue with stakeholders, through two-way communication aimed at better understanding their needs, interests, and expectations;
- We respect the local communities in which we operate and strive to identify, prevent, or mitigate potential negative environmental, social, and economic impacts of our activities, applying high standards of health, safety, and environmental management;
- We provide accessible and effective grievance mechanisms, through which individuals, organizations, and communities can report potential negative impacts of our operations and request appropriate review and resolution;
- We contribute to the social and economic development of communities connected to our activities, striving to create long-term shared value through partnerships, community investment, and support for local initiatives;
- We cooperate with government institutions, local authorities, community representatives, intergovernmental and non-governmental organizations, and other stakeholders, with the aim of developing and supporting sustainable projects that contribute to the development of the communities and regions where we operate.

6 | Monitoring and Reporting

DPTU “Bucim” DOOEL Radovich, in line with the principles and standards of the Solway Group, strives for the continuous improvement of its sustainability performance through the regular monitoring and evaluation of results.

The Company provides transparent, accurate, and objective information about its sustainability performance, as well as about planned activities for its further improvement, in order to inform relevant stakeholders.

Data on economic, social, and environmental performance is monitored and analyzed as part of the Company's management system, and reports are prepared and submitted in accordance with the Group's requirements.

The Solway Group prepares and publishes an annual report on economic, social, and environmental performance at the corporate level, in accordance with the sustainability reporting standards of the Global Reporting Initiative (GRI).

7 | Accountability and Approval

This Policy is implemented in accordance with the principles and guidelines established by the Solway Group. Oversight of its implementation at Group level is carried out by the Board's Sustainability Committee, which is responsible for monitoring compliance with the obligations set out in this Policy.

The Committee is authorized to propose amendments and additions to this Policy, in line with changes in international standards, principles, and practices in the field of sustainability.

This Policy is regularly reviewed and updated. Proposed amendments to the Policy are prepared by the competent organizational units, in cooperation with the legal and sustainability departments, and are subsequently reviewed and approved in accordance with established procedures.

DPTU “Bucim” DOOEL Radovich ensures the proper implementation of this Policy through the allocation of responsibilities, as well as through the organization of training and awareness activities for employees, with the aim of familiarizing them with and ensuring their application of the principles set out in this Policy. At the same time, the Company establishes mechanisms for the continuous monitoring of implementation progress, including regular evaluation of the fulfillment of assigned responsibilities and the adoption of corrective measures where necessary.

8 | Definitions

Term	Definition
Board of Directors (Board)	The highest governing body of the Solway Group, which determines the strategic direction and oversees the management and operations of the companies within the Group, including DPTU "Bucim" DOOEL Radovich.
Environmental, Social, and Governance (ESG)	A concept encompassing the environmental, social, and governance aspects of an organization's operations, providing a framework for assessing sustainable and ethical business practices.
Sustainable Development Committee	A committee of the Board of Directors of the Solway Group, established by the Solway Group's Board of Directors, which provides strategic support for and oversight of sustainability-related matters, including environmental protection, corporate social responsibility, corporate governance, and other relevant topics related to the Group's sustainable operations.
Sustainability Management	A system of policies, objectives, processes, and activities through which DPTU "Bucim" DOOEL Radovich plans, implements, monitors, and improves its policy and performance in the field of sustainable development.
Management	The management team responsible for overseeing the day-to-day operations of DPTU "Bucim" DOOEL Radovich and for implementing the strategic direction set by the Group.
Governance	A system of policies, rules, and practices through which an organization's operations are managed and overseen. It includes mechanisms for accountability, the balance of authority, and the continuous monitoring of the implementation of adopted policies and decisions.
Risk	The effect of uncertainty on set objectives. Risk represents a potential event or condition that may have negative consequences, but may also represent an opportunity for improvement or development.
Risk Management	A systematic and coordinated process of identifying, analyzing, assessing, and managing risks, with the aim of reducing their negative impact and improving decision-making.
Social Licence to Operate (SLO)	The level of trust and acceptance shown by stakeholders and the wider public toward the Company's business practices and operational activities.
Stakeholder	An individual, group, or organization that may be affected by the Company's activities, products, services, or the impacts of its operations, or that has an interest in them.

9 | Change History

Date	Version	Description of Change
18.05.2026	1.0	Creation and approval

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