



# **China Molybdenum Co., Ltd. Anti-Money Laundering Policy**

**(This policy was prepared in both Chinese and English versions. Where there is discrepancy between the Chinese and English versions, the Chinese version shall prevail)**

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## Chapter 1 Introduction

China Molybdenum Co., Ltd. and all of its directly or indirectly controlled or majority-owned subsidiaries (collectively, CMOC) are committed to conducting business according to high standards of legal and ethical conduct in all jurisdictions in which we operate. CMOC requires that all of its directors, officers, employees, and agents act ethically and lawfully in conducting business on behalf of CMOC.

CMOC has adopted a risk-based approach to prohibiting and actively preventing money laundering as well as any activity that may facilitate money laundering or facilitate terrorist or criminal activities by complying with all applicable legal requirements. This Anti-Money Laundering Policy (the Policy) implements the anti-money laundering (AML) requirements of the various jurisdictions in which we operate.

CMOC or its business units may be subject to the AML laws and regulations of several jurisdictions. These may include the AML laws of the People's Republic of China (PRC), including Articles 191, 312, and 349 of the PRC Criminal Law; the AML laws of the Republic of Brazil (Brazil), including Law 9,613/98, as amended by Law 12,683/2012; the AML laws of the Democratic Republic of the Congo (DRC), including law n°04/016 of 19 July 2004; the AML laws of the United States, including 18 U.S.C. §§ 1956, 1957; and the AML laws of other jurisdictions, as applicable (collectively, the AML laws). This Policy is intended to set forth global standards that apply to all of our business units. Nothing in this Policy prevents a local business unit or subsidiary from promulgating a local policy that is necessary to comply with the law of the jurisdiction in which the entity operates. Such policies shall supplement, and not contradict, this Policy.

## Chapter 2 Applicability and Penalties

This Policy is applicable to all of CMOC's operations worldwide. It applies to all of CMOC's directors, officers, and employees. For the avoidance of doubt, this Policy also applies to CMOC's agents, consultants, and joint ventures controlled or operated by CMOC.

The specific penalties for violating AML Laws vary by jurisdiction, but are generally severe. In addition to being subject to CMOC's own internal disciplinary measures (which includes dismissal), individuals who violate the AML Laws may be subject to imprisonment and fines by local government authorities in the relevant jurisdictions.

## Chapter 3 Definitions

Definitions of “money laundering” may vary based on the laws and regulations in force in each jurisdiction where CMOC operates. Money laundering is generally defined as engaging in acts designed to conceal or disguise the true origins of illegally-derived funds so that the proceeds appear to have been derived from legitimate sources or otherwise constitute legitimate, legally-obtained assets.

Money laundering may aim to achieve a number of different illicit objectives, including:

- (a) Concealing the true source of funds in a transaction;
- (b) Concealing the ultimate destinee or disposition of funds in a transaction;
- (c) Eliminating an audit trail such that it appears that the funds came from legitimate sources;
- (d) Avoiding income or other taxes in any jurisdiction.
- (e) Money laundering is associated with a wide range of criminal activity, including drug trafficking, fraudulent schemes, bribery, terrorism, tax evasion, and bulk cash smuggling, among others.

## Chapter 4 Anti-Money Laundering Compliance Officer

CMOC will designate an employee with necessary experience and capability as its Anti-Money Laundering Compliance Officer (AML Compliance Officer).

The duties of the AML Compliance Officer include the following, among others:

- (a) Monitoring compliance by CMOC and all of its employees with applicable AML Laws in each jurisdiction where CMOC operates;
- (b) Defining the scope of counterparty identification and due diligence, also known as “know your customer” due diligence (KYCDD) or counterparty due diligence (CDD, and together with KYCDD, AML Due Diligence), to be performed upon each customer or third party to whom CMOC anticipates making a payment;
- (c) Identifying, interdicting, and reporting to the appropriate authorities suspicious transactions that may violate AML laws;
- (d) Overseeing communication with and training programs for CMOC employees in connection with this Policy and AML requirements;
- (e) Keeping, maintaining, and updating (as needed) all records related to AML that must be preserved according to applicable AML Laws.

The AML Compliance Officer is vested with full responsibility and authority to enforce this Policy.

## Chapter 5 Customer and Third-party Due Diligence

Before entering into an agreement with a third party, CMOC employees must confirm that appropriate AML Due Diligence has been performed. Unless the AML Compliance Officer decides otherwise, the following information represents the minimum information that will be collected and provided to the AML Compliance Officer for verification prior to making any payments or completing any transactions with any new customer or other third party:

- (a) Full name (and date of birth, for an individual);
- (b) Address (including place of incorporation and principal place of business, for entities);
- (c) Articles of Incorporation (for legal entities);
- (d) An identification number or tax identification number (as applicable), or government-issued documentation certifying the existence of the business or enterprise (e.g., for an individual, national ID, passport, bank statement; for an entity, evidence of corporate registration in the jurisdiction where the entity is organized); and
- (e) In the case of legal entities, please obtain all of the above information for any individuals who, directly or indirectly, own 10% or more of the equity interests of the legal entity.

Please note that the above represents the minimum information required to perform AML Due Diligence for the CMOC Group unless the AML Compliance Officer decides otherwise. Local CMOC subsidiaries may require the collection and verification of additional information. Consistent with CMOC's risk-based approach to AML compliance, "simplified" AML Due Diligence may be appropriate in some cases, while "enhanced" AML Due Diligence may be appropriate in other cases. Enhanced due diligence procedures will require a more extensive set of information to be collected from the customer or counterparty. The decision of whether to perform simplified or enhanced AML Due Diligence rests with the AML Compliance Officer. The AML Compliance Officer has the discretion to determine

whether, in specific low-risk cases, it would be appropriate to rely on publicly available information rather than the specific items identified in this Policy particularly when dealing with less risky counterparties.

If a potential or existing customer or other third party refuses to provide the information requested for purposes of AML Due Diligence, or appears to have intentionally provided misleading information, you must not proceed with the transaction without the specific, written approval of the AML Compliance Officer.

## Chapter 6 Compliance and Training

CMOC employees and agents must be familiar with and perform their duties according to the requirements set out in this Policy. CMOC employees or agents who violate this Policy are subject to disciplinary action, up to and including dismissal.

To ensure that all CMOC employees and agents are thoroughly familiar with the provisions of this Policy, the AML Compliance Officer shall organize AML training and provide resources to CMOC employees and agents, as appropriate, and typically on an annual basis.

Any CMOC employee or agent who suspects that this Policy may have been violated must immediately notify the AML Compliance Officer at [compliance@cmoc.com](mailto:compliance@cmoc.com).

## Chapter 7 Duty to Cooperate

CMOC may at times undertake a more detailed review of certain transactions. As part of these reviews, CMOC requires all employees, agents, and third-party representatives to cooperate with CMOC, outside legal counsel, outside auditors, or other similar parties. CMOC views failure to cooperate in an internal review as a breach of these individuals' obligations to CMOC under this Policy or applicable laws.

## Chapter 8 Questions about the Policy

If you have any questions relating to this Policy, please contact the AML Compliance Officer.

## **Chapter 9 Effectiveness and Interpretation**

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

This Policy shall come into force after being approved by the Board of Directors of the Company. If any policy previously issued by CMOC conflicts with this Policy, this Policy shall prevail.