

MEC

MONGOLIA ENERGY CORPORATION

蒙古能源有限公司

Incorporated in Bermuda with limited liability

Stock Code: 276

2025

ENVIRONMENTAL, SOCIAL
AND GOVERNANCE REPORT

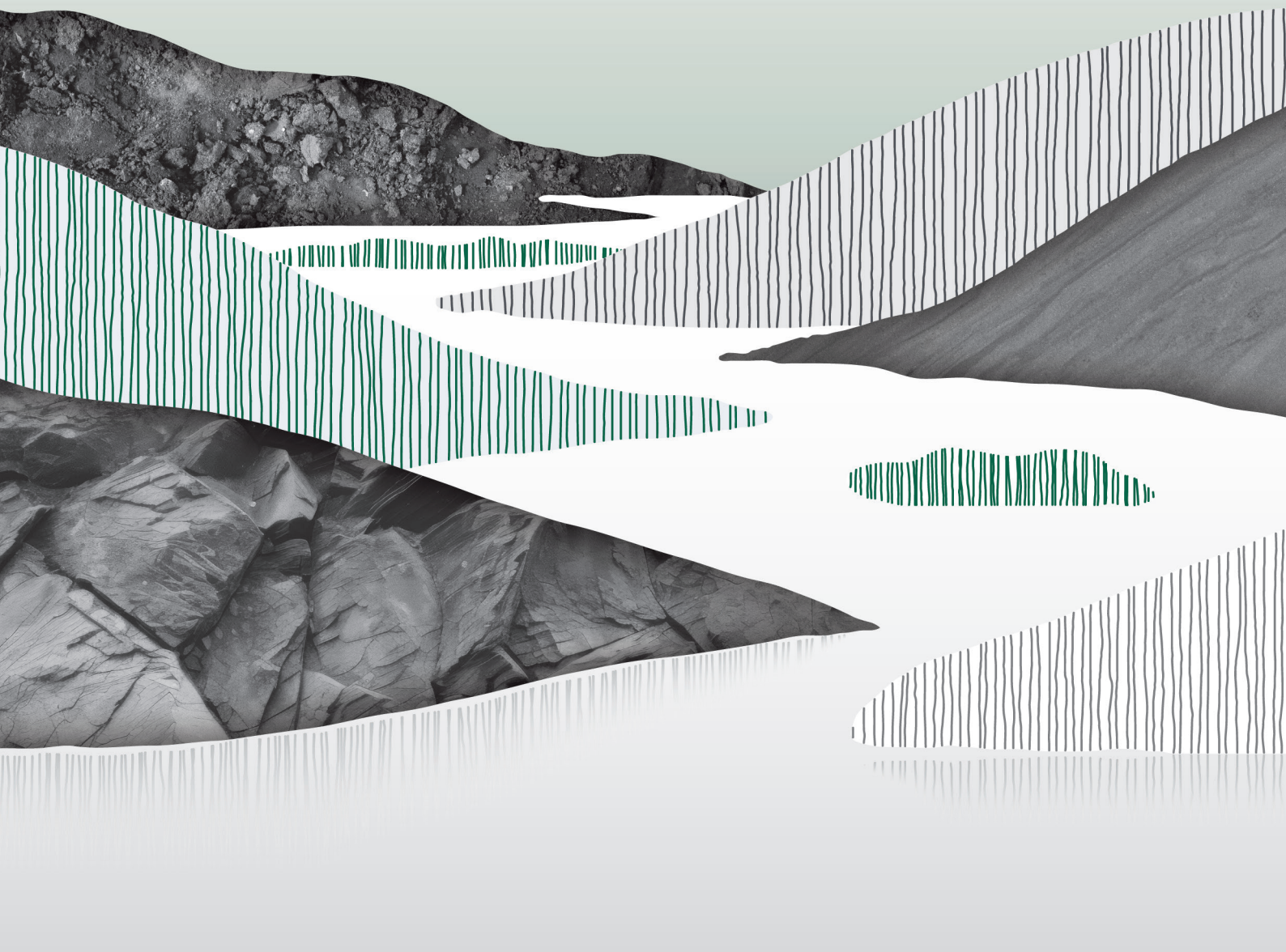


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ABOUT THIS REPORT



This Environmental, Social and Governance Report (“**Report**” or “**ESG Report**”) provides information about the principles and actions of sustainable development of Mongolia Energy Corporation Limited (“**MEC**” or the “**Company**”, and together with its subsidiaries, the “**Group**”) as a corporate citizen and its relationships with major stakeholders. The contents of this ESG Report have been prepared after taking into account the materiality of sustainability issues arising from the Group’s operations.

OUR PURPOSE

To acquire, explore, and develop energy and mineral resources related projects in a professional, sustainable, and responsible manner. We aim to become a globally recognized energy and resources company while maximizing returns to stakeholders.

OUR VALUES

MEC’s Sustainability Values are driven by integrity and responsibility:

T RANSPARENCY

O PPORTUNITY

C OMMUNITY

A CTION

R ESPONSIBILITY

E DUCATION

- T:** We ensure the disclosure of relevant information in a prompt and frank manner to our stakeholders.
- O:** We intend to seek the best potential outcome in each situation to create a better future for our Company and stakeholders.
- C:** We are keen to create a sense of unity through shared common goals and interests, not only with our shareholders, but also with our employees and local communities.
- A:** We do what is necessary to achieve our goals without compromising any of our core values and beliefs.
- R:** We abide by our Company’s moral obligations and the regulations of our host countries, and are always accountable for our actions.
- E:** We take pride in sharing our values and knowledge with all of our stakeholders, and believe that there is much we can learn from each other.

ABOUT THE REPORT (CONTINUED)

OUR STRATEGY

We carry out our purpose and values through the effective leadership of our board of directors (the “**Board**”), the effort of our management, our operations, and the contributions from our stakeholders including shareholders, staff members, customers, suppliers, local communities and governmental units.

INFORMATION OF THIS ESG REPORT

The disclosure of the ESG data in this Report not only provides MEC’s investors comprehensive information for evaluating the Group’s operations, but also acts as a platform to help us to develop image and trust among all involved stakeholders such as MEC’s shareholders, clients, governments of the countries where we operate and the local communities. All information included in this Report is based on the data submitted to the relevant Mongolian governmental agencies and results of regularly monitored reports of performance from the Khushuut mine site and Xinjiang washing plant, as well as from data of other governmental authorities, and the information and sources which we believe to be true and correct¹.

BOUNDARY AND SCOPE OF THIS REPORT

The Report presents the work that we had done on environmental and social aspects for the financial year, from 1 April 2024, to 31 March 2025 (“**Financial Year**”) and includes the environmental and social responsibility programs taken place at Khushuut mine site and the entire far-western province of Khovd, Mongolia, and at our washing plant in Xinjiang, the People’s Republic of China (“**PRC**” or “**China**”). However, some of the information is presented on calendar-year basis in order to ensure that it is consistent with the information submitted to the various governmental bodies in Mongolia and the PRC.

REPORTING GUIDE

Our Report is prepared in accordance with the ESG Reporting Guide under the Rules Governing the Listing of Securities on the Stock Exchange of Hong Kong Limited (the “**Listing Rules**”). The ESG Reporting Guide encourages companies to report on practices and performance that relate to sustainability in a manner that is transparent and uses a globally shared framework of indicators. For the purpose of ensuring the materiality and consistency of data presented in this Report, and to allow accurate trends of comparison and conclusions, we have been presenting, where possible, the annual data and indicators in the same uniform structure and format as the past reporting years.

¹ For external assurance, MoEnCo LLC has instructed a certified corporate law firm in Mongolia TemugeLaw LLC, (www.temugelaw.com) to verify the Report’s compliance facts in Mongolia.

REPORTING PRINCIPLES

Materiality: As we are principally engaged in coal mining business for providing energy resources to our customers, it is inevitably that our environment will be disturbed. Therefore, it is our priority to preserve environment through our careful and thoughtful planning in the process of operation. That is, to minimize the impact of our operation on the environment and to improve, if not restore, the affected areas as best as we could to their original state before mining. Sustainability relates not only to our business and environment, but also to the people. In this connection, we regard our employees as the major assets of our Group. Therefore, health, safety and welfare of our staff members and our communities have been given major attention in our goal of sustainability. Through the communication and feedback from our stakeholders including management, staff member, shareholders, customers, suppliers and governmental bodies from various channels, our “to care” priorities are the environment, health and safety of people and communities in our goal of sustainability.

Quantitative: Information on the standards, methodologies, assumptions and calculation methods employed in this ESG Report are set out in the relevant sections.

Consistency: For the purpose of ensuring the materiality and consistency of data presented in this Report, and to allow accurate trends of comparison and conclusions, we have been presenting, where possible, the annual data and indicators in the same uniform structure and format as the past reporting years unless otherwise stated.

CORPORATE GOVERNANCE

We believe good corporate governance principles and practices are the foundation of a company’s long-term success. MEC maintains the highest ethical standards when making decisions to protect the interests of the Company and its shareholders. Our governance policies and practices are well-established and apply to every business activity at all levels.

The Board is the highest governance body within the Group having the responsibility to review and maintain the corporate governance to ensure that the Group is consistently conducting the business in a socially responsible and ethical manner, as well as handling alleged unethical conducts and violation of rules promptly and discreetly. Members of the Board have a diverse range of business and professional expertise and possess appropriate experience and competencies to discharge their duties effectively. We are committed to follow the best practices in managing the environmental aspects of our operations. We pay utmost attention to minimize the impact and invest considerable amount of our resources in environmental management and community relations.

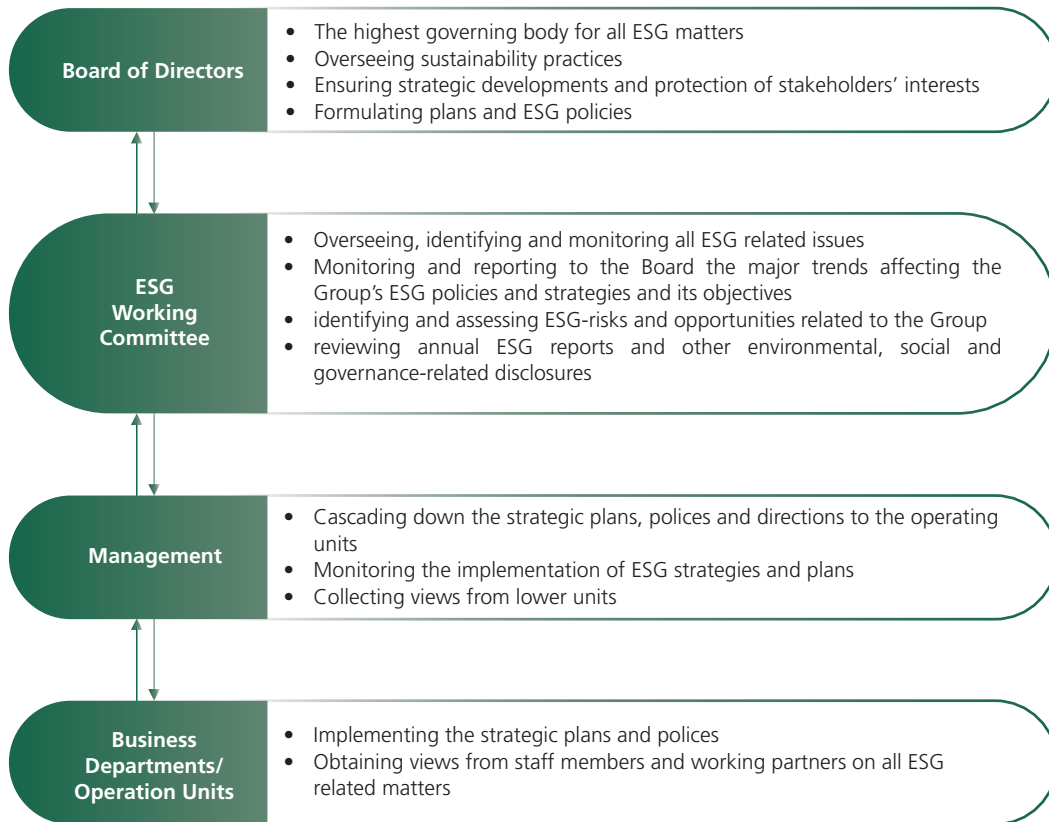
The Board sets and regularly reviews the policies of the Company in carrying out the purpose and values of the Group in the conduct of its business. It gives strategic directions as well as managing the implementation of our business strategies.

The Board is the highest authority of the Group to oversee the ESG issue. The ESG Working Committee is responsible to oversee the Group’s strategies, policies, and practices on ESG matters, identify and review ESG issues, related risks, monitor ESG performance, make recommendation, and update the latest development to the Board.

Under the ESG structure, the management has the responsibility to cascade down the ESG strategic directions to the business units and to monitor the implementation plans. The business units will comply with the directions given by the management and to implement the ESG policies in their daily operation, gather feedback from their working partners and reflect the relevant issues up to the ESG hierarchy.

ABOUT THE REPORT (CONTINUED)

ESG GOVERNANCE STRUCTURE



THE COMPANY

MEC 新疆蒙科

促进口岸经济
共建美丽青河

人人讲家规 家家讲家风

THE COMPANY (CONTINUED)

MEC is an investment holding company. The Group's principal business is coal mining and exploration which is operated by our indirect wholly-owned subsidiary in Mongolia, MoEnCo LLC ("**MoEnCo**"). Our principal project is the Khushuut Coking Coal Project in Khovd province, Mongolia. We sell coking coal and thermal coal to our customers in China and Mongolia.

As of early 2025, the Khushuut's project consists of:

- (i) open pit coal mine with 608 hectares of total mine and drilling disturbed area;
- (ii) a dry coal processing plant ("**DPP**") with an annual two million tonnes capacity;
- (iii) a 400 people capacity camp at Khushuut mine site with residential quarters, sports and recreational hall, and other comfortable living facilities;
- (iv) an on-site chemical laboratory, repair workshops for heavy duty mine machineries and trucks, storage hangars, the camp heating infrastructure with industrial boilers, and other technical facilities;
- (v) 311 km heavy duty paved road from the mine to Bulgan border crossing point with the PRC with 16 "park-and-rest" areas; 1,066 m long paved road connecting Khushuut bag and Tsetseg soum center;
- (vi) Uyench Customs Bonded Yard ("**Uyench CBY**") and processing center with a 60-residents capacity camp, covering 50 hectares;
- (vii) a customs processing facility near the border between Mongolia and China covering 10 hectares; and
- (viii) a coal washing plant in China operated by our PRC subsidiary.

The Khushuut mine is located at the height of 2,000 meters in average above sea level in Altai Mountains, exposing to extreme weather conditions throughout the year. Temperatures fluctuate between 28° C in summer and -40° C in winter. Winter is long with heavy snowfall and gale force wind between October and April. The wind is always strong and gusty on-site with wind speed of up to 20 meters per second. Extreme weather conditions and remote mountainous terrain not only make the mining operations challenging, but also call for specific environmental conservation policies and measures. Significant resources are required to conserve the environment and minimize the impact of our operations on the local community.

MoEnCo has been ranked one of the top 100 Mongolian companies for eight consecutive years since 2017.

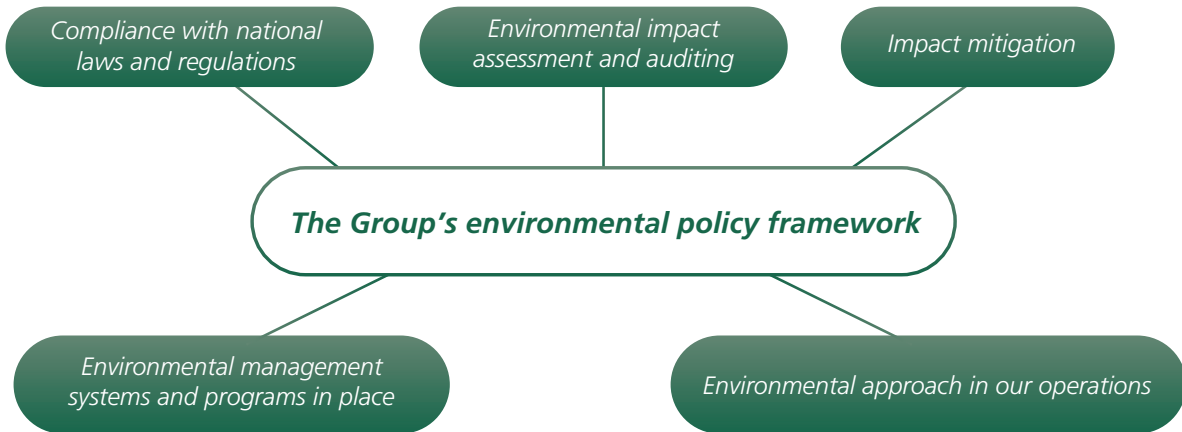
The Group understands while operating as one of the top Mongolian mining companies, we have a duty to work responsibly and minimize the impact of our operations on the environment while maximizing the good return to all our stakeholders.

ENVIRONMENTAL (CONTINUED)

ENVIRONMENTAL POLICY AND MANAGEMENT

The Group believes that through a deliberate planning of our mining-related projects, implementation of pollution control measures, monitoring the effects of mining and rehabilitation of mined areas would minimize the impact of our activities on the neighboring communities, restoring the environment and maintaining long-term land sustainability.

The Group's environmental responsibility principles and actions make up the following structure:



MEC sees the importance of promoting green culture at our workplace and encourages our employees to sustain green efforts in their daily lives. Our Hong Kong head office has participated in the World Green Organization (“WGO”) Green Office Awards Labelling Scheme since 2015, which is a programme that strives to ensure environment sustainability as set out in the United Nations Sustainable Development Goals (UNSDG). There has also been eco-healthy workplace practice enriching the scheme since 2017. In recognition of our efforts and commitment to reduce energy consumption and waste, and move further towards a low carbon office operation, MEC has been awarded the WGO’s “Green Office” Label since 2015. MEC has also been awarded the “Eco-Healthy Workplace” Label since 2017. The two awards demonstrate that we have done our utmost from the top level in Hong Kong in promoting green and healthy workplace practice.

As a country with scarce water resources, harsh climate and lands prone to desertification and erosion, Mongolia imposes rigorous regulations, permit application requirements and procedures on environmental conservation, management and reporting. MoEnCo has to conduct its operations in compliance with the relevant environmental legislations strictly, including but not limited to, the Minerals Law of Mongolia, the General Law on Environmental Protection, Law on Environmental Impact Assessments, Air Law, Land Law, Water Code and other laws as well as a number of national standards. MoEnCo has adopted its environmental management system (“**EMS**”) and integrated it into the mining and related operations for the purposes of clean production and environmental conservation.

MoEnCo’s environmental management system is a main component of the overall environmental management. Effective implementation of the EMS helps us to comply with the environmental laws and regulations, identify technical and economic benefits, and ensure that corporate environmental policies are timely adopted, followed and reported to the Mongolian government and the shareholders of the Company. MoEnCo’s EMS consists of the following:



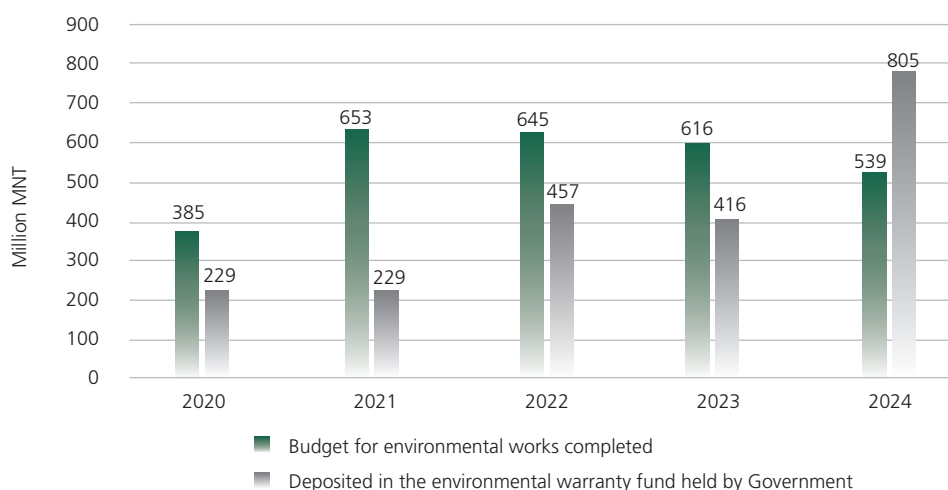
- **Health, Safety and Environmental (“HSE”) Department** oversees the environmental protection compliance and performance of MoEnCo. The team is responsible for preparing and effective realization of MoEnCo’s environmental management plans and programs.
- **Legal Department** works closely with the environmental management team to ensure compliance with the relevant environmental legislations. The Department is responsible for developing and having adopted internal regulations and procedures concerning the environmental compliance, ensuring timely submission of environmental plans and reports to related authorities, and obtaining the requisite licences, certification and permits.
- **Emergency Response Team** identifies and addresses possible measures to reduce the adverse impacts of our operations on the environment and health and safety of our workers and surrounding community.

Under the law, a mineral licence holder must deposit a certain amount of funds as assurance of its performance of environmental reclamation. As of early 2025, MoEnCo accrued approximately MNT804.9 million (approximately HK\$1,842,972.94²) in a special warranty account of Ministry of Environment and Climate Change. And under our 2024 Environmental Management Plan, we disbursed approximately MNT538.5 million (approximately HK\$1,232,999.04) for the planned environmental protection works.

² In this Report, conversion of Mongolian togrog into HK\$ based on the exchange of HK\$1 = MNT436.74. No representation is made that only togrog or could have been converted at the above exchange rate or any other rates.

ENVIRONMENTAL (CONTINUED)

MoEnCo's environmental scheme budget



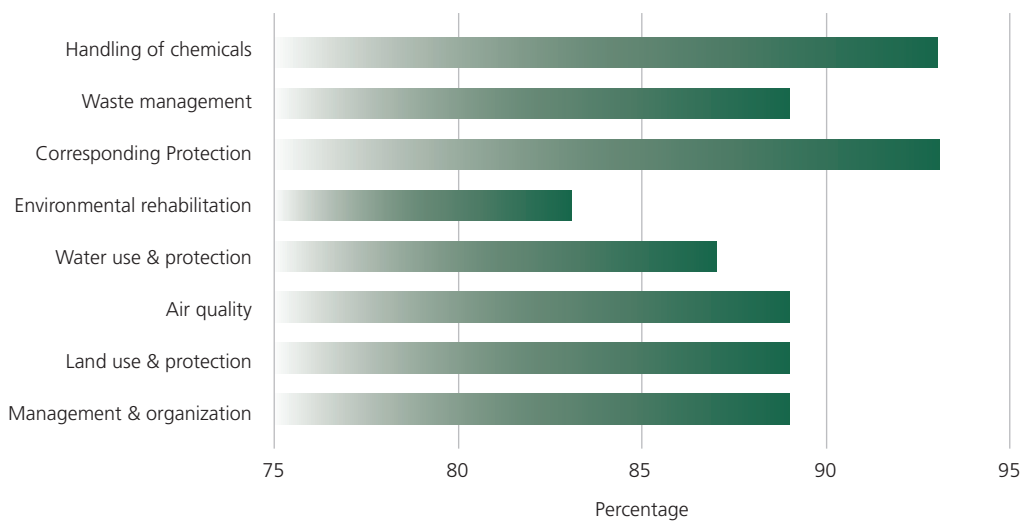
MoEnCo submits an annual environmental management plan for the coming year to (i) the Ministry of Environment and Climate Change of Mongolia for approval, and (ii) the Mineral Resources and Petroleum Authority of Mongolia as reference. In addition, MoEnCo's environmental team holds meetings regularly with experts of the Ministry of Environment and Climate Change, environmental inspectors of Khovd province Government and other related government officers in relation to our environmental management strategy and efforts.

ENVIRONMENTAL AUDITS

MoEnCo's environmental auditing is a management tool for measuring the effects of our environmental management system and performance against the legal requirements and standards. As we are increasingly aware of the significant risks posed by environmental and occupational health and safety issues, MoEnCo maintains two types of environmental audits:

- **External audit** – MoEnCo periodically engages a licenced independent environmental audit company for a full review and assessment of MoEnCo's environmental management, internal procedures, performance and rehabilitation activities. In 2024, we engaged a licenced environmental auditor, EBG Consulting LLC, which carried a comprehensive audit at MoEnCo's office and Khushuut camp in March-May 2024. The audit assessed our mining operations against 219 criteria where 197 criteria were concluded as compliant with the legal and standard requirements resulting in the overall compliance rate of 90.3%.

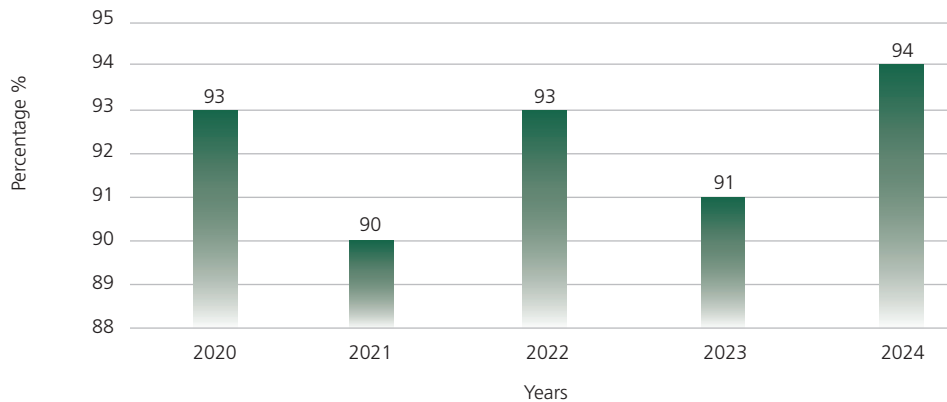
MoEnCo's mining operations in compliance with laws, regulations and standards



- **The Mongolian government audit** – In accordance with the Law of Mongolia on Government Control and Inspection, the relevant bodies of central and local governments schedule and conduct regular and random inspections and assesses MoEnCo’s environmental performance.
 - The Government conducts its audit of environmental performance of mining companies in accordance with the criteria set forth in the “Environmental Management Plan Development, Review, and Reporting Procedures” approved by the order A-618 of the Minister of Environmental and Tourism of October 29, 2019.
 - Following the amendments to the relevant laws, the General Agency for Specialized Inspection, which performed the environmental monitoring and inspection in the mining industry, was dissolved by the end of 2022, and its function were delegated to related Ministries, agencies and industry associations.
 - In December 2024, the Khovd province Governor formed a 9-member group of provincial executives with the purpose of evaluating the MoEnCo’s 2024 environmental performance. After working at Khushuut mine, the group held a discussion session with the relevant managers of MoEnCo. After thorough assessment, this working group concluded that our 2024 environmental performance was 94% successful and complete while some of the planned works were in progress or postponed due to the external circumstances.
 - Such government reviews and assessments are annual as set forth in the law. Over the past years, the government assessment of the MoEnCo’s annual environmental performance rating has scored over 90%:

ENVIRONMENTAL (CONTINUED)

Government assessment of MoEnCo's environmental performance



ENVIRONMENTAL PERFORMANCE REPORTING

As a mining licence holder and operator, MoEnCo has strict reporting obligations under a number of laws (General Law on Environmental Protection, Minerals Law, Water Code, and so forth).

Following the reporting procedure set forth in the law, the report of the MoEnCo's 2024 Environmental Management Plan performance has been presented to the Ministry of Environment and Climate Change of Mongolia along with the Khovd Government assessment statement. After the review, our environmental management report endorsed by the Ministry of Environment and Climate Change has been submitted to the Khovd Environmental Office, Khovd Governor and representatives of the provincial Assembly and local administration of three soums where we operate (Tsetseg, Darvi, Uyench of Khovd province).

The Group's reporting scheme

In Hong Kong:

- The Group reports to the HKEX through submission of the Company's annual ESG report

In Mongolia:

- Ministry of Environment and Climate Change – through the online system, annually
- Mineral Resources & Petroleum Agency – through the online system, annually
- National Emergency Management Agency – paper-based, annually
- Khovd province Government – through the online system, annually
- Tsetseg, Darvi, Uyench soums of Khovd – paper-based, by-annually
- Regional Water Authority – paper-based, annually
- Public – through the Company's and MoEnCo's websites and social media

External:

- Extractive Industries Transparency Initiative Mongolia database www.eitimongolia.mn

Some additional reporting is mandatory with respect to specific parts of MoEnCo's environmental performance and social responsibility. For example, a comprehensive water use report is submitted annually to the local water authority, and the Khushuut camp medical center presents an annual detailed report of its patients and disease cases to the Khovd province Health Department. Moreover, every year MoEnCo presents its report to the Khovd province Governor on implementation of the Cooperation Agreement signed between MoEnCo and the province.

Headquartered in Oslo, Norway, the Extractive Industries Transparency Initiative is the global standard to promote the open and accountable management of oil, gas and mineral resources. Mongolia joined this initiative as one of its 56 implementing countries. Under its national obligations, Mongolian government required mining companies to submit detailed reports to its database which is open to the public. MoEnCo submits its report every year in accordance with this requirement. Mongolian government also periodically engages an independent research institution to audit the corporate reports presented.

AIR QUALITY MONITORING

Rapid urbanization in Mongolia in recent decades caused a problem of unplanned settlements and increased air pollution in the capital city. In response, the Government took some critical actions in the past couple of years including the tightening of the relevant regulations and standards that are applicable throughout the country. Air quality concerns lead to more thorough government inspections of mining operations.

Regular monitoring of the air quality indicators and prevention and mitigation of air pollution at Khushuut mine site is the key part of MoEnCo's annual environmental management program. With regard to the air emissions and monitoring procedures, all MoEnCo's operations must be in compliance with:

- Air Law of Mongolia, Air Pollution Fee Law, and related regulations;
- permit requirements prescribed by various laws of Mongolia;
- mandatory reporting to the Government; and
- national air quality standard MNS 4585:2016 (Air quality: General technical requirements) approved by the National Standardization and Metrology Committee of Mongolia in 2016.

ENVIRONMENTAL (CONTINUED)

Air quality. General technical requirements MNS 4585:2016 standard

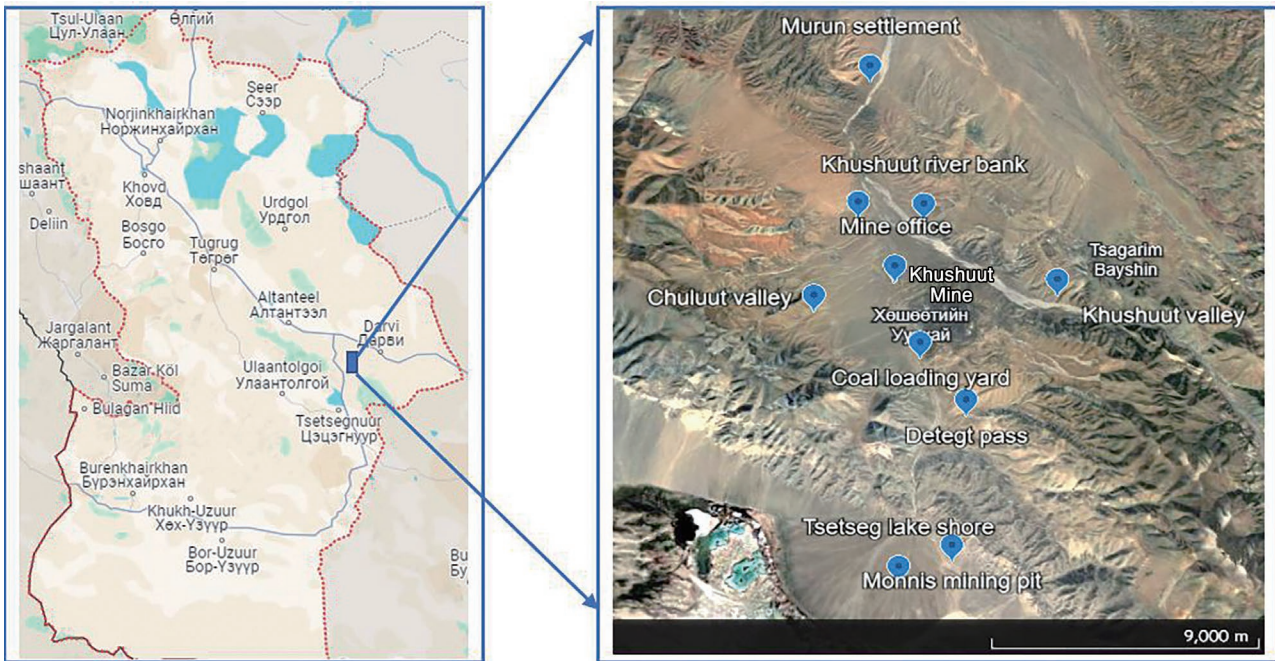
Name of the contaminant	Measured in average of	Measurement unit	Permissible amount
Chemical impact			
Sulfur dioxide (SO ₂)	Average of 20 mins		450
	Average of 24 hours	µg/m ³	50
	Annual average		20
Carbon monoxide (CO)	Average of 20 mins		60,000
	Average of 1 hour	µg/m ³	30,000
	Average of 8 hours		10,000
Nitrogen dioxide (NO ₂)	Average of 20 mins		200
	Average of 24 hours	µg/m ³	50
	Annual average		40
Ozone (O ₃)	Average of 8 hours	µg/m ³	100
Dust (total measurable particles)	Average of 20 mins		500
	Average of 24 hours	µg/m ³	150
	Annual average		100
Coarse particles (PM ₁₀)	Average of 24 hours	µg/m ³	100
	Annual average		50
Small particles dust (PM _{2.5})	Average of 24 hours	µg/m ³	50
	Annual average		25
Lead (Pb)	Average of 24 hours	µg/m ³	1
	Annual average		0.25
C ₂₀ H ₁₂	Average of 24 hours	µg/m ³	0.001
Physical impact			
Level of noise			
•	day time (07:00 – 23:00)	Average of 16 hours	60
•	evening and night hours (23:00 – 07:00 of the next morning)	Average of 8 hours	45

MoEnCo ensures its compliance with the air quality requirements through:

- integrating the air pollution prevention actions as an important part of our environmental management scheme;
- regular measurements of air particles at Khushuut using own equipment;
- hiring an independent evaluator – the relevant research institute for independent testing and assessment annually;
- joint measurements and tests together with the environmental inspectors of Khovd province as part of their inspection and assurance procedure; and
- periodical hiring a private licenced auditing company for comprehensive audit of MoEnCo's compliance with its environmental obligations including the pollutants emissions.

In July 2024 and October 2024, MoEnCo engaged the Green Asia Consulting LLC, a private licenced company, for air sampling and testing in 10 locations around Khushuut mine site under the approved procedures and using the latest testing devices. The contractor's team of three professionals along with two representatives of the Central Environmental Monitoring Laboratory of Department of Meteorology and Environmental Monitoring (government body) and two representatives of Khovd Environmental Office sampled and measured sulfur dioxide (SO₂), nitrogen dioxide (NO₂), carbon monoxide (CO), small particles dust (PM_{2.5}), coarse particles dust (PM₁₀) in ten locations and 11 heavy metals concentrations in two locations within 12 km radius of the mine pit. Method of measurements was air suction either (i) for 20 continuous minutes, six times a day over three days; and/or (ii) continuous 24 hours over three days depending on a type of equipment used. All samples were analyzed by the Central Environmental Monitoring Laboratory (semi-governmental body).

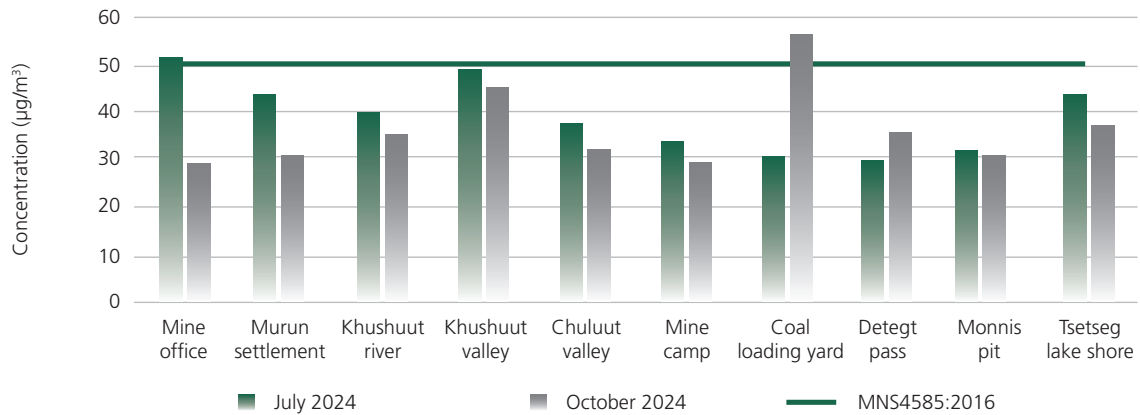
ENVIRONMENTAL (CONTINUED)



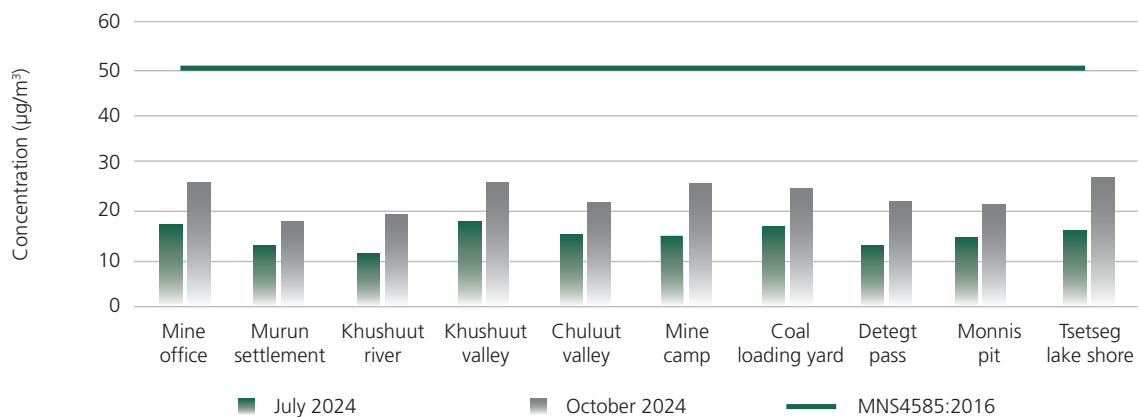
Khushuut air sampling points:

- Mine office, 1.2 km.
- Coal loading yard, 1.6 km.
- Khushuut river bank, 2.9 km.
- Khushuut valley, 3.5 km.
- Mine camp, 3.5 km.
- Detegt pass, 3.8 km.
- Chuluut valley, 4.3 km.
- Monnis mining pit, 9.4 km.
- Murun settlement, 10.7 km.
- Tsetseg lake shore, 12 km.

Khushuut air NO₂ content, average of 20 minutes measurements of three days^{Note}

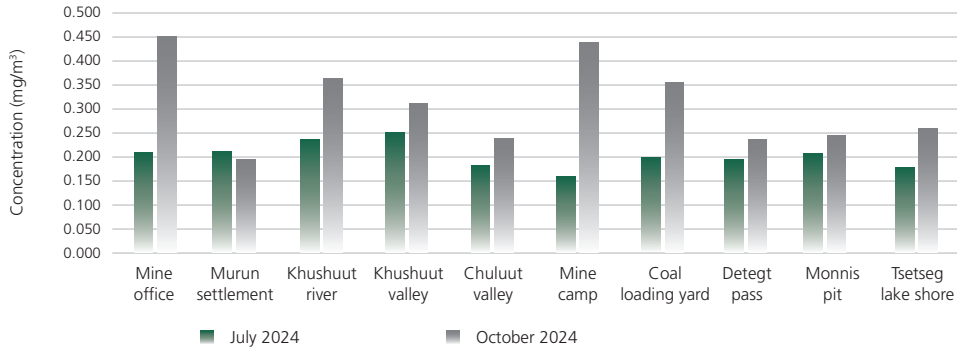


Khushuut air SO₂ content, average of 20 minutes measurements of three days^{Note}



ENVIRONMENTAL (CONTINUED)

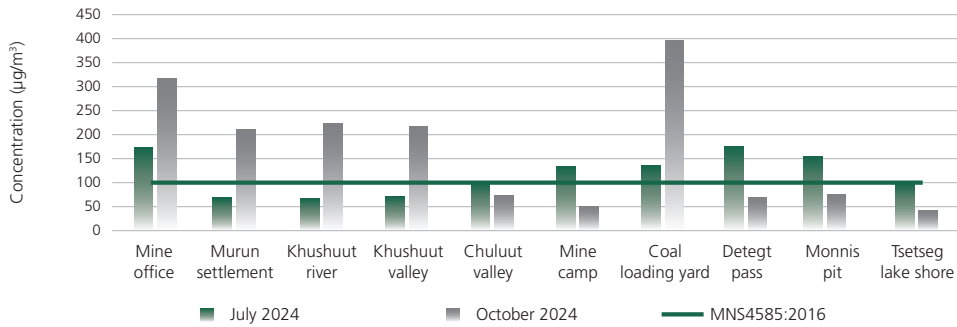
Khushuut air CO content, average of 20 minutes measurements of three days^{Note}



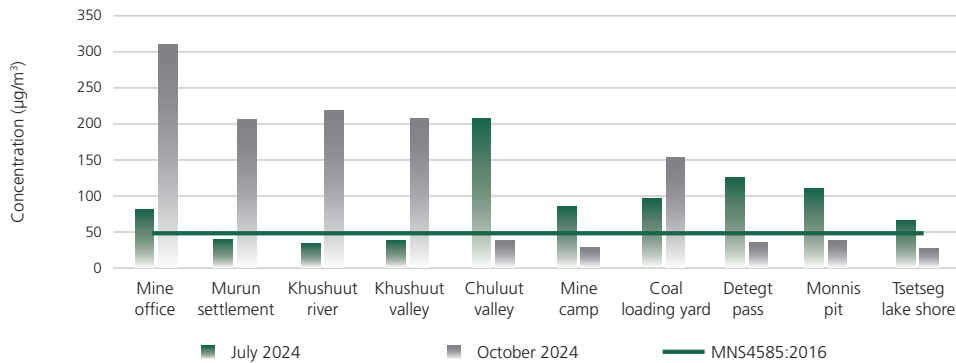
Note: the measurements were six times for 20 minutes each, but the reference numbers used are the ones for 24 hours, this is to satisfy the MoEnCo's requirement set forth in the terms of reference for the contractor's work. Generally, the device used by the contractor for measuring these elements requires an electricity source which is not available in that bare prairies, thus the contractor drives between the measuring points with own small portable generator and makes measurements for 20 minutes at each location.

The above charts indicate that the NO₂ and SO₂ concentrations in the air around Khushuut mine are in compliance with the national standard. Carbon monoxide was detected at all testing points while the amounts were minimal and well within the permissible level (10,000-60,000 µg/m³).

Khushuut air PM₁₀ content, comparative of 24 hours measurements



Khushuut air PM_{2.5} content, comparative of 24 hours measurements



The dust content in the PM₁₀ and PM_{2.5} categories were above the permissible level at most of the measuring points. Having the most intensive operations, including mining, transporting and processing of coal and building mine infrastructures during the measurement days in Khushuut mine led to the results.

Heavy metals in air

The independent contractor Green Asia Consulting LLC also took air samples at two measuring points (namely, the mine office and the main camp) and analyzed them for concentration of 11 heavy metal elements. The analysis results indicate that concentrations of heavy metal elements in the air around MoEnCo's mining operations were either undetectable or minimal and in compliance with the Mongolian standard MNS 5885:2008 (Permissible levels of airborne pollutants: general technical requirements) and MNS 6063:2010 (Acceptable concentration of pollutants in atmosphere of urban and public areas).

Greenhouse gas emissions (“GHG emissions”)

GHG emissions	2021	2022	2023	2024
Total GHG emissions (Tonne CO₂ equivalent)	25,417.28	89,279.22	101,069.64	111,729.83
GHG emissions in Scope 1 (Tonne CO ₂ equivalent)	24,257.89	88,121.60	99,735.58	109,691.41
GHG emissions in Scope 2 (Tonne CO ₂ equivalent)	1,159.39	1,157.62	1,334.06	2,038.42
GHG emissions per tonne of production* (Tonne CO₂ equivalent/tonne)	0.01	0.03	0.02	0.01

* In this report, production refers to the total amount of raw coal without processing in 2024 in relation to calculating intensity, unless otherwise specified.

Mongolia's total carbon dioxide (CO₂) emissions is on a notably lower end of the global scale. However, if in term of CO₂ emissions per capita, Mongolia is the ninth highest per capita emitter reaching 23.7 GHG emissions per capita according to the World Bank Group. This is often explained by a small, sparse population. The country's large land mass as the land-use change is often used as one of main indicators of GHG emissions, prevalence of coal mining in the country's economy and a large number of livestock.

ENVIRONMENTAL (CONTINUED)

Mongolian Parliament approved the National Action Programme on Climate Change in 2011 and Green Development Policy in 2014 which include not only the conceptual roots for the country's contribution to the climate change mitigation but also key sectorial action plans at the national level, indicators for measuring the progress and concrete measures in response to the climate change covering all principal sectors of economy including, among others, efficient use of energy and measures in mining operations. Mongolia has developed the Nationally Determined Contribution which was approved by the Cabinet decree No.407 of November 2019, with an aim to contribute to the Paris Climate Accords of 2015. In this document, Mongolia has enhanced its mitigation efforts with policies and measures to be implemented in key economic and natural resource management sectors by 2030. These and other relevant national level policy documents served as a basis for Mongolian companies to develop and implement their own climate change targets. Mongolia presented its Initial Biennial Update Report under the UN Framework Convention on Climate Change in 2017, and the second update report called National Inventory Report in 2023.

An on-going increase of operations and production result in increase of fuel and electricity consumption, inevitability leading to more air pollutants and greenhouse gas produced. As such, it would not be appropriate at this stage to set a target for reduction in CO₂ and other gases produced in its operational activities. It would be more appropriate to set a target of reducing GHG emissions when we reach an optimal production level.

MEASURES TO REDUCE GHG EMISSIONS

The Group is committed to making its operations and supply chains in the PRC and Mongolia sustainable through reducing its GHG emissions which, as the Group believes, shall support a more resilient and healthier environment and communities where we operate. MoEnCo includes plans and actions in order to reduce the GHG emissions in the annual Environmental Management Plan including, among others, those relating to

- improving our energy use efficiency and reduction of diesel consumption for energy generation;
- greenhouse gas mitigation through better mining land preservation and use techniques;
- air emissions measuring and monitoring;
- annual vehicles and equipment emissions certification;
- efficient organization of coal transportation and imposing strict requirements for the contractors' trucks;
- due reporting to the Government, and so on.

The Mongolian mandatory air and soil quality standards, with which MoEnCo strictly complies, do not require measuring and complying with GHG emissions limits, but MoEnCo now contemplates to expand our greenhouse gas mitigation effort by way of

- (i) measuring, monitoring and reporting on more greenhouse gas elements during MoEnCo's annual emissions measuring session;
- (ii) hiring and seeking recommendations of a professional research institution, relevant government body and academia;
- (iii) developing and implementing a dedicated long-term program.

DUST REDUCTION

By its very nature, the cutting and breaking of rocks during coal mining operations, top soil stripping, coal loading and unloading, produce dust. Prevention of dust hazards during mining operations is the main health and safety concern for MoEnCo. We take various types of preventive and mitigation measures at several production phases through:

- **Constructing and maintaining the environmental protection facilities.** A special fence for protecting against dust pollution around our DPP and the adjacent customs control area was built and commissioned by MoEnCo in 2014. It is 2,292 meters long and 12–15 meters high.
- **The “water wall” technology.** In 2017–2018, MoEnCo installed and expanded the fixed water misting systems, one of the best technologies available today to control dust in the air, at the coal loading and unloading area of the Khushuut mine. Currently four systems operate to create 20–30 meters tall and 35–40 meters wide water walls at Khushuut mine. A new fixed water misting system has also been installed at Uyench CBY.
- **Additional misting air in the dust intensive areas.** In early 2017, MoEnCo piloted a water sprinkler system at our DPP, the most intensive coal handling area. From early 2018 to the current date, three sprinkler machines (orchard mist blowers and blast sprayers with a tank) with 16 tonnes water spaying capacity work at the site to reduce dust concentration in the air to about 40% throughout a day. As the dust reduction and prevention measure have proven effective, MoEnCo now has nine sprinkling machines, fixed and movable, which mist the air around the DPP and other heavy-dust locations.
- **Watering the roads and pathways** within and adjacent to the mine pit. There are now five vehicles with total capacity of 100 tonnes which uses the mine’s waste water for daily watering the mine pit inner roads and the coal loading and unloading areas for dust reduction.
- **Measuring dust concentrations in the air** using own equipment. MoEnCo’s environmental team measures fine particle contaminants (PM_{10} , $PM_{2.5}$) monthly using DUSTTRAK2 equipment at 15 points around the Khushuut mine and reports the results to the camp director.
- **Enforcing speed limits** when driving on the mine roads and sideways. MoEnCo adopted and enforces internal driving rules with 5–30 km/h speed limits for coal hauling trucks on mine roads, and also installed some speed measuring devices on roadways.
- **Covering the dirt road surfaces** with gravel.
- **Making purposed strips of vegetation** along the roads close to the camp and office buildings and between them and the mine pit, and planting trees and bushes on these strips.
- **New coal processing technology is underway:** a new dry coal processing plant with a capacity of 5.0 Mt/a is being built to replace the existing DPP by end of 2025. The new plant’s so-called ‘enclosed’ technology of dry processing shall allow to reduce the electricity consumption and, more importantly, the air pollution at our mine site.

ENVIRONMENTAL (CONTINUED)

VEHICLE EMISSIONS CONTROL

MoEnCo and its transporting contractors are required to operate in accordance with the requirements and adhere to the following procedures pertaining to the vehicle emission:

- Transportation Law of Mongolia of 1999, Regulation of 2010 on Technical Inspection of Vehicles, and other relevant regulations; and
- National standard MNS 4598:2025 (General requirements and technical conditions for road vehicles), national standard MNS 5013:2009 (Petrol engine vehicles – maximum permissible levels and measuring methods of exhaust emissions), national standard MNS 5014:2009 (Diesel engine vehicles – maximum permissible levels and measuring method of opacity), approved by the Standardization and Metrology Agency.

As of the end of 2024, there were about 1,100 heavy duty trucks and other machineries belonging to MoEnCo and 26 transportation and haulage companies contracted to perform hauling, loading, unloading and carrying our coal to our domestic and international customers. All trucks must undergo mandatory inspection imposed by the government, purchase the due permits and pay annual emission taxes at the Khovd province Auto Vehicles and Transportation Center. All vehicles should meet the emission standards. MoEnCo also ensures that all trucks engaging in coal transportation have been duly inspected, meeting the emission requirements and having obtained the necessary customs permits. All MoEnCo's coal transport agreements include provisions ensuring the carrier's obligation to comply with the emission standards.

Our vehicles control team at Khushuut consists of four auto mechanical engineers and 21 repairmen. They operate a daily checkpoint at the exit of the Khushuut mine. Coal transporting trucks are thoroughly monitored, and inspected if necessary, through their haulage on the Khushuut road and at the entrance of the Bulgan border crossing port by MoEnCo's team of three supervisors, three senior coordinators, 11 transport logistics specialists and three customs coordinators. In addition to MoEnCo's monitoring, various government agencies including (i) National Auto Vehicles and Transportation Center, (ii) Mongolian Customs General Administration, and (iii) Industry Monitoring Department of the Ministry of Road and Transportation Development ensure that all trucks meet the general requirements and technical conditions specified in the standards and also may perform selective testing of emissions. These three agencies also perform their thorough inspection duties at the Bulgan border crossing point (before heading to the PRC) for trucks loaded with coal and the returning unloaded trucks.

ENERGY CONSUMPTION

Khushuut mine energy consumption	2020	2021	2022	2023	2024
Diesel used for electricity production (million liters)	1.13	1.27	1.57	2.28	2.28
Intensity (kWh/t)	0.785	0.692	0.447	0.39	0.248
Electricity purchased from the provincial grid (kWh)	1,379,109	1,454,690	1,452,475	1,673,847	2,147,969
Intensity (kWh/t)	0.95	0.79	0.41	0.28	0.23
Total electricity consumption (kWh)	4,246,561	5,258,140	6,645,990	7,775,868	6,659,182
Intensity (kWh/t)	2.95	2.86	1.89	1.32	0.72

As MoEnCo is in the growing trend, an increase of operational activities and production would require an increase in power consumption. In addition, due to the complexity of the mine which the coal seams distribution may vary geologically from one area to the other, it would not be appropriate at this stage to set energy efficiency target for its operational activities. Nevertheless, MoEnCo set out the table above in relation to the electricity consumption for the prior years for reference.

ENVIRONMENTAL (CONTINUED)

WATER USE MANAGEMENT AND QUALITY MONITORING

Water use management is a critical part of the MoEnCo's environmental management. The need for sustainable water management and water quality monitoring within the mining industry is critical in Mongolia due to scarcity of water and the semi-arid climate. MoEnCo takes this necessity seriously and continuously improves its water management efficiency through various management channels including:

- Not using of fresh water in the mining operations. Khushuut mine uses water primarily for dust suppression, employees' needs at the camp, greening and nurturing trees and other vegetation. Except for the camp use, we only use waste water that naturally builds up at the bottom (mainly due to snow and ice melting with warmer seasons) of Khushuut mine pit.
- Obtaining permits for use of (i) fresh water and (ii) waste water. These waters use permits are sought from:
 - Khovd province Environmental Office which issues Water Use Certificate annually upon satisfactorily concluding the water use agreement for the previous year.
 - Huisiin Gobi – Tsetseg Lake Watershed Area Administration (the regional water authority) and government-owned Mongol Us company (the local water provider) with which MoEnCo enters into the water use agreement annually.
- Preparing the annual Comprehensive Water Use Report and submitting it to the regional water authority Huisiin Gobi – Tsetseg Lake Watershed Area Administration. The local water provider and the regional water authority jointly evaluate and approve the report. Only upon satisfactory acceptance of MoEnCo's reporting of its water conservation and quality monitoring efforts, they will issue a water permit for the subsequent year. MoEnCo's 2024 report was accepted with good level of the Government approval in December 2024.
- Planning and performing a set of medium and long-term water management actions at our Khushuut operations that are inserted in the annual Environmental Management Plan and having this Plan approved by the relevant Government agencies. The performance report on the annual Environmental Management Plan is assessed and endorsed by the Ministry of Environment and Tourism and Khovd province government.
- Duly paying the water use fees to the Khovd province budget.
- Employing professional environmental specialists' team at Khushuut camp including a hydrogeologist.
- Water saving awareness and techniques are one of topics of regular training sessions at Khushuut camp.
- Getting a permit from the provincial administration and hiring a local contractor to remove and dispose the camp sewage waste at the treatment facility in Khovd center.
- Quarterly cleaning and trash pick-up at the natural springs and other water sources in the vicinity of the Khushuut mine and in the surrounding area.
- Quarterly submission of the water use volume data and water testing results to the local water administration. Although not mandatory, such data sharing not only allows joint monitoring of MoEnCo's water use but also proves our dedication to transparent local operations.

Khushuut water consumption	2020	2021	2022	2023	2024
Amount of fresh water used for residential purpose (m ³)	12,221	17,891	19,380	17,865	17,883
Amount of water used for industrial purpose:					
underground water (m ³)	44,965	110,777	125,189	131,155	155,225
intensity (m ³ /t)	0.031	0.06	0.036	0.022	0.017
drainage water (m ³)	19,507	44,913	49,358	41,191	25,857
intensity (m ³ /t)	0.013	0.024	0.014	0.007	0.003

Mining is an industry which will invariably involve the use of water. More water will be used when extraction activities and production ramp up. As MoEnCo is in the growing trend, an increase of operational activities and production would result in an increase use of water. In addition, due to the complexity of the mine which the coal seams distribution may vary geologically from one area to another similar to our air pollution control, it would not be appropriate at this stage to set an efficiency target for the water used in its operational activities. Nevertheless, MoEnCo set out the table above in relation to the water consumed during the prior years for reference. Because water is a scarce resource, MoEnCo has been striving to preserve this natural resource and will endeavor to use it in the most suitable ways.

MoEnCo's water use management and quality assurance program must comply with Water Law, Law on Water Pollution Fee, Subsoils Law and Law on Hygiene and a large number of mandatory and voluntary standards, guidelines and regulations pertaining to (i) safety and standard of various types of water (drinking, technical, sewage, drainage, recycled, etc.), (ii) recycling procedures and (iii) safety of water related facilities and equipment.

In 2024, the Mongolian government carried out the Khushuut water quality assessment in accordance with the requirements and procedures of the relevant laws and standards:

- MoEnCo sent its 22 water samples collected from 10 locations to the National Food Safety Reference Laboratory (government reference laboratory) for chemical analysis quarterly. The laboratory reported on a regular basis that the Khushuut water consistently satisfied the Mongolian national water quality standard MNS 0900: 2018 (Health protection and safety: hygienic requirements, quality and assessment of drinking water);
- MoEnCo also sent 22 drinking water samples quarterly collected from five locations to the above laboratory for bacteriological analysis. In all cases, the laboratory evaluated Khushuut water as "meeting requirements of the residential drinking water standards of Mongolia"; and
- We submitted 22 samples of Khushuut drinking water and 12 natural drainage water samples from the mine pit bottom (from total of 10 locations around Khushuut mine including nearby rivers and natural springs) to the government-owned laboratory of the Water Department for heavy metals testing. The laboratory presented us its conclusion that all samples met the Mongolian national water quality standard MNS 0900:2018 (Health protection and security: hygienic requirements, quality and safety assessment of drinking water) and MNS 4586:2024 (Water quality: General requirements).

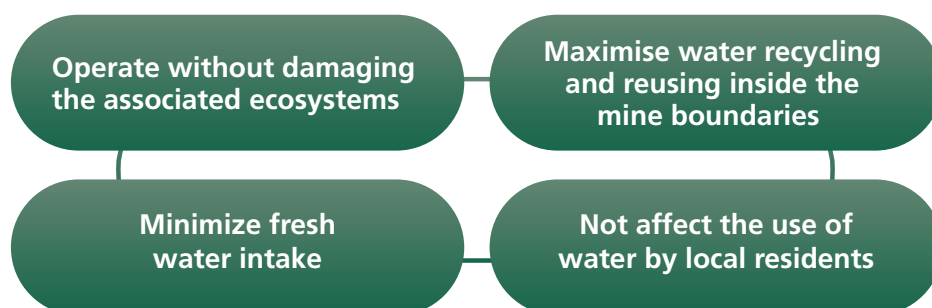
ENVIRONMENTAL (CONTINUED)

MoEnCo conducts four types of water monitoring and observation: water level, flow, spurt force, and quality. Sources of monitoring include a variety of natural and industrial sources: nearby rivers and creeks, natural springs, snow samples, water monitoring boreholes, drinking water wells, drainage water on the bottom of the mine pit, waste water. Our monitoring data and government assessments have demonstrated that no water sources have been notably affected by water extraction for our current mining operation and there are no significant cases of water depletion. On regular schedules throughout the year, MoEnCo monitors, tests, measures or simply manages different types of water sources in its operations:

- Surface water flow, level and volume monitoring through rivers points measurements taken quarterly.
- Measurements of water flow and volume of natural springs in radius of 4 km around the mine site.
- Underground water level and flow monitoring at three special water monitoring boreholes.
- Monitoring the fresh water intake and usage at two existing wells through established meters and 24-hour surveillance through several external and internal cameras. The meter readings and camera recordings were submitted quarterly to the environmental inspector of Darvi district and Huisiin Gobi – Tsetseg Lake Watershed Administration.
- Measuring and using the drainage water produced at the bottom of Khushuut mine pit in warmer seasons. We put this water into use for sprinkling roads for dust suppression, mine and camp greenery and irrigation, training against potential fire hazard and for drilling works.

Moreover, MoEnCo supports the Uyench – Bodonch – Bulgan Watershed Area Administration and Huisiin Gobi – Tsetseg Lake Watershed Area Administration in their monitoring of waters of the four major rivers of these basins and their smaller tributaries. Within the scope of our social responsibility, every summer we join the Administrations to measure the level, flow, force, and quality of those streams upon which the Administrations collect, analyze and maintain the data in their public databases of local natural resources.

Principles of MoEnCo's comprehensive monitoring of water quality at Khushuut



All water wells, that MoEnCo uses, have duly installed and certified water meters and surveillance cameras which not only help measuring water intake and monitoring the water transportation but also play a role in water saving efforts. All our water meters are duly tested (and calibrated if needed) and verified by the local water provider's professionals annually.

To improve our residential water recycling at the mine site, MoEnCo has drilled two new boreholes near the sewage systems for identifying any leaks and monitoring if any subsoil and underground water is being polluted from the sewage. Samples are taken from these monitoring boreholes and tested every month.

Because MoEnCo's hydrogeological data used for mining operations and environmental conservation works have been developed over a decade, in summer of 2021 we hired MIW LLC to study the hydrogeological conditions of the Khushuut coal deposit and determine the potential amount of water inflow to the open pit in the coming years, and conduct a groundwater survey at the licence area and provide recommendations for the water use optimization in our operation. Now this study is being used to help MoEnCo to better project its annual water use for mining operations, efficiently budget our water conservation works and plan the necessary equipment procurement in longer term.

In the arid lands like Khushuut area, protection of natural water source is an important technique of local ecosystems conservation. In the past, MoEnCo planted bushes and trees around natural springs in the area while in 2023 we erected or renewed tall net fences around five springs in four soums to protect this water source against grazing domestic and wild animals and undue human interactions. Overall, a total of 18 natural springs in Darvi, Tsetseg, Uyench and Bulgan soums have been protected and commissioned to the respective soum governments over the period of 2018-2024.

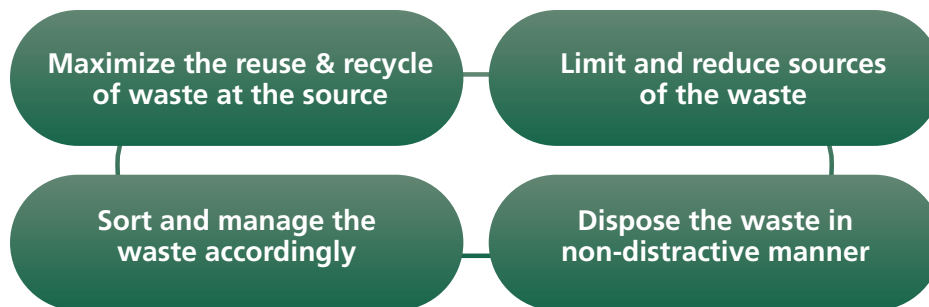
ENVIRONMENTAL (CONTINUED)

Water conservation and quality assurance is an important part of MoEnCo's internal mandatory training program attended by our camp employees as well as by workers of our subcontractors located by Khushuut. We also participate and support Watershed Area Administrations in organizing various local water awareness events. For example, on the occasion of the World Water Day celebrated annually on 22 March, the Huisiin Gobi – Tsetseg Lake Watershed Area Administration organizes the "Blue Ribbon" campaign in Tsetseg soum, and over the past years MoEnCo has become one of the main supporters and sponsors of this event. In March 2024, this event was organized with participation of water executives, ecology teachers and the eco-club pupils of nearby five soums of Khovd and Gobi-Altai provinces. Various practical training and discussion sessions (major conservation works carried out in the local water basin, ways to protect surface and groundwater, career choice in water specialization, introduction to the nearby Myangan Ugalzat National Park, MoEnCo's water use and conservation efforts, etc.), sports and artistic events were attended by more than 80 participants. MoEnCo's water managers presented about their water conservation efforts at Khushuut mine and MoEnCo's Corresponding Protection Program. During this event, the Huisiin Gobi – Tsetseg Lake Watershed Area Administration and participating rural public schools signed a memorandum of understanding to promote the water awareness and to actively involve their pupils in the Khovd nature conservation works.

INTEGRATED WASTE AND SEWAGE MANAGEMENT AT THE CAMP

A proper management through modern technologies is the core of the Group's waste policy. We believe that recycling and managing the waste of our operations is essential for long term environmental sustainability in the region. When planning and enforcing its waste management program, the Group adheres to the following strategy:

MoEnCo's waste management strategy



MoEnCo prepares a relevant and up-to-date waste management plan as part of its annual comprehensive Environmental Management Plan. This waste management plan covers (i) types of waste produced at the camp and mine, their characteristics and management methods; (ii) incineration and ash disposal; (iii) waste water, its reuse and disposal; (iv) hazardous waste including the one of our medical center at the camp; (v) non-hazardous and other waste streams; (vi) the camp's landfill management (vii) emissions information; (viii) contractor services in regards to the waste disposal; and (ix) all the permitting and compliance information.

Waste from the Khushuut mine operations requires disposal via a variety of different methods depending on the nature of the waste and availability of suitable facilities at the camp or nearby settlements. MoEnCo's vigorous waste management program has been in compliance with the Mongolian laws pertaining to waste management, occupational safety and hygiene, various regulations and national standards, and is realized through:

- **Compliance:** obtaining waste permits for dumpsites, disposal, and transportation annually upon having positive assessment of the waste management program realization in the previous year;
- **Paying for waste disposal:** to the local budgets, including for permits and land use for the camp's landfill;
- **Contracting a professional body:** several contracted local specialized and licenced companies are engaged in (i) securely storing, transporting and recycling used oil and other combustible liquids originating from mining equipment and vehicles, and (ii) collecting and disposal of trash along the Khushuut road;
- **Sorting the mine camp trash and handling accordingly:** plastic, paper or non-recyclable trash is sorted and handled separately. For instance, in 2024 the mine camp delivered to the urban cleaning, landscaping and development company under the Khovd administration two full trucks of pressed plastic waste for further recycling and use in the urban works. In 2024 the camp installed an additional plastics pressing machine.
- **"Clean-up days":** General clean-up days are organized periodically involving all available employees at the mine camp. They pick up trash and clean in surrounding areas weekly, quarterly and annually depending on the radius of covered area.
- **High-tech incineration:** burning certain types of waste in a special oven, the disposal are potentially harmful to the environment including used machinery oil;
- **Regular training and awareness building on importance of recycling:** all relevant personnel MoEnCo and its contractors at the mine camp undergo regular practical training about sorting and handling trash, canteen waste, used oil of the machinery, etc. For example, 807 truck drivers of our contractors attended such training in 2024.
- **Operating a landfill:** burying or disposing the various types of waste at the camp's landfill. The camp's dumpsite location was professionally selected and specifically designated by the local government.
- **Government inspection and reporting:** the camp's landfill is regularly inspected by the provincial and soum environmental inspectors. In December 2024, MoEnCo's entire waste management system and dumpsites were inspected by the provincial environmental inspector and the hygienist visiting our Khushuut mine site as part of the annual government inspection.

ENVIRONMENTAL (CONTINUED)

Waste produced	2020	2021	2022	2023	2024
Hazardous waste including medical (kg)	43.13	72.5	151.6	111.06	176
Intensity (kg/t)	0.000029	0.0000395	0.000043	0.000019	0.000019
Non-hazardous waste including solid, residential, sewage (t)	1,346.3	793.7	982.9	982.9	1,570.3
Intensity (t/t)	0.0009	0.0004	0.00028	0.00017	0.00017

In 2024, the mine camp's hazardous waste which consisted mainly of medical trash, has been delivered to the contracted Tsetseg soum hospital for proper disposal, and duly paid the hazardous waste fee. MoEnCo contracts local waste removal companies to regularly collect trash and maintain its cleanness along the 311 km Khushuut road. The contracted professional service provider National Waste Recycling Association offered recommendations on improving the management of the integrated mine landfill at Khushuut mine, handling of hazardous waste of the coal laboratory, temporary storage of various types of waste before sorting, waste disposal at the camps of MoEnCo's subcontracted coal transporting companies, and management of waste along the 311 km coal transport road. The Waste Recycling Association held a number of practical demonstrations, presentations and discussions with MoEnCo's environmental team and managers of camps at Khushuut.

As MoEnCo is in the growing trend, an increase of operational activities and production would require more workers and result in an increase quantity of waste. In addition, due to the complexity of the mine which the coal seams distribution may vary geologically from one area to the other, it would not be appropriate at this stage to set a reduction target of waste in its operational activities. Nevertheless, MoEnCo set out the table above in relation to the waste produced for the prior years for reference.

To protect our environment and public health, we have two sewage water purification facilities which was built in 2020, with daily capacity of 30 m³ each at the Khushuut workers' camp and at the mine's main office. Our Khushuut camp have also made use of sewage recycling facility with 50 m³ capacity since 2022. This facility is in addition to the existing 30 m³ sewage recycling system of the advanced environmentally friendly Japanese technology. The new facility processes and recycles almost 99% of sewage water which shall be later used for the camp's technical needs (machinery repair workshop, dust reduction, fire prevention training, etc.).

SOIL QUALITY MONITORING

Soil quality monitoring is important because open cast mining operations routinely modify the surrounding landscape by exposing previously undisturbed earth materials. We are well aware that erosion of exposed soils, extracted mineral ores, tailings, and fine material in waste rock piles can result in soil damage. We also realize that mine disturbed lands may represent a greater source of GHG emissions compared to undisturbed land surface in its natural state. This is why since 2010 MoEnCo has been continuously monitoring the quality of soil around the Khushuut mine which is essential for proper assessment of the associated hazards. Soil quality monitoring at Uyench CBY had been started even before its operation in January 2017.

MoEnCo conducts regular and comprehensive soil quality monitoring at two locations:

- At Khushuut mine vicinity the soil monitoring has been carried since 2010. Then in 2012 the Laboratory of Soil Science of Institute of Geography of Mongolian Academy of Science selected the current 16 soil sampling points within 5 km radius of the Khushuut mine pit.
- At Uyench CBY the soil quality monitoring started even before its operation in January 2017. There are six soil sampling points here.

In 2024, soil samples were collected quarterly at the above 22 sampling points and sent to the “Deej”, a private accredited soil and water testing laboratory. Total of 64 samples were analyzed for general chemical composition, texture, moisture and heavy metals content against the limits set forth by the national standard MNS 5850:2019 (Soil quality. Permissible levels of soil pollutants). In May, 2024, total of 16 samples of fertile topsoil from the mine area were sent to this laboratory for radiation analysis. The results presented by this laboratory indicate that all soil samples contained normal levels of moisture and other naturally occurring chemicals, the standard requirements were met, and there was no soil pollution or radiation contamination. The results of these soil quality analysis have been presented to the Khovd province Environmental Office as well as to the Ministry of Environmental and Tourism as part of annual reporting.

REHABILITATION OF MINE DISTURBED AREAS

Timely and professional rehabilitation is essential for the Khushuut mine area with its extreme weather conditions, high mountain altitude and fragile, thin, sporadic topsoil. MoEnCo’s annual Environmental Management Plan includes the land rehabilitation program which complies with (i) the Land Law, Law on Subsoils, and Minerals Law; and (ii) a number of national standards pertaining to land assessment, degradation prevention, topsoil preservation and mining land rehabilitation works.

Our land rehabilitation program is realized through various land preservation and community support works, some of which are statutory but many of them are voluntary on the part of MoEnCo, and includes the following:

- **At the Khushuut mine site:** geological or biological reclamation of mined area; preservation of fertile topsoil; planting and nurturing trees, bushes and making vegetation strips along the coal transporting roads; around the Khushuut village and the mine pit. Our environmental team along with our land works contractors at the camp ensures rehabilitation including (i) leveling and contouring, (ii) reshaping, (iii) preserving the fertile topsoil, (iv) re-vegetating through seeding of native grass and perennials and planting trees and bushes. In 2024, 85.8 m³ from the land of topsoil of 51.6 hectares were stripped. Currently, Khushuut mine maintains topsoil piles totaling 195,101 m³. To preserve fertility of this topsoil and support growth of perennial plants on these piles, an automated sprinkler irrigation system with a 10-tonne water tank was installed on these piles in May 2020. For reducing dust emissions from the mine DPP and other sources, a total of 7,000 native trees were planted on slopes of the surrounding Khushuut hills in previous years. Now, MoEnCo performs their regular watering, nurturing and maintenance. MoEnCo annually procures 100 kg local perennial seeds and 500 litres of organic fertilizers from Khovd suppliers for the purpose of vegetating the topsoil piles. During the 2024 fall, tree planting session, our camp workers planted 1,000 trees and shrubs of eight different local varieties around the camp and its vicinity.

ENVIRONMENTAL (CONTINUED)

- In the community:** offering land reclamation in non-mining areas in a volume corresponding to the size of our mined lands (Corresponding Protection Program); rehabilitating mine areas abandoned long ago at the request of the administration of soums where we operate; caring for historic monuments in isolated areas; land improvements and technical works at remote water sources such as natural springs; helping the local residents to protect their vegetable gardening land lots against grazing animals; supporting the communities to preserve and recreationally use the local natural sites.

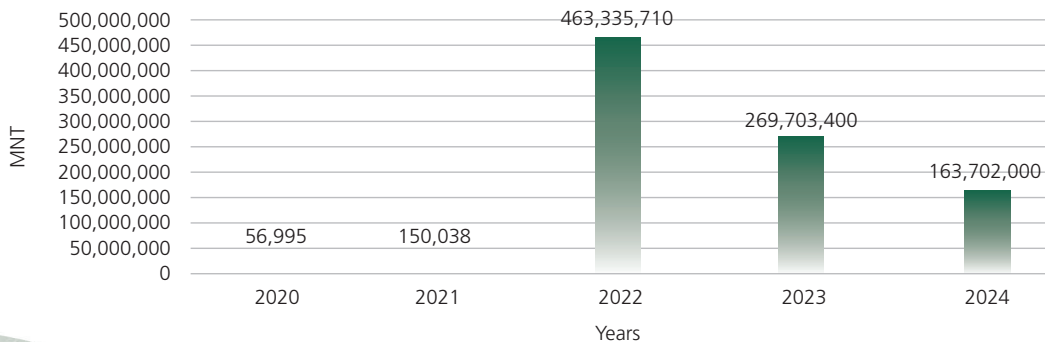
Every 2-3 years, MoEnCo undertakes a larger study of plants, animals or soils conditions in the mine vicinity through hiring of professional body, for identifying the impact of the mine operations on the surrounding flora and fauna. For example, in August 2023, in collaboration with researchers and professors of the Biology Department of Khovd province branch of Mongolian National University, MoEnCo carried out a research on composition of vegetation and animal species in the mine vicinity as well as distribution and abundance of very rare, rare, vulnerable, protected and ecologically important species over the area of 164 km². Findings and materials of this research became a basis of a new regular training course organized at the camp. In 2024, 425 mine workers attended this awareness training.

In 2024, MoEnCo’s topsoil removal, preservation and storing procedures were inspected by the Khovd province environmental inspector and assessed as being in compliance with the requirements of the MNS 5916:2008 (Requirements for removal and temporary storage of fertile soil during earth excavation) standard. In 2024, no area underwent full geological or biological reclamation within the Khushuut mine’s operation fields because of the active stage of MoEnCo’s operations and on-going mining. We make some remote parts of the mining licence areas available to local herders for grazing their domestic livestock.

CORRESPONDING PROTECTION PROGRAM

In collaboration with the Sustainable Mining Land Management Project of United Nations Development Programme office in Mongolia, MoEnCo initiated the “Corresponding Protection” program in 2016. The purpose is to offer land reclamation in close proximity to our Khushuut mining areas in a volume corresponding to the size of land used for mining and related operations. We also voluntarily take up the obligation of such corresponding restoration in the 2021-2024 Cooperation Agreement signed with the Khovd province Government. Moreover, we incorporate plans for the Corresponding Protection program in our annual Environmental Management Plan with allocated budget for each category of works contemplated, and duly report on realization of the program to the Ministry of Environmental and Tourism and provincial government.

MoEnCo’s 2024 budget for Corresponding Protection Program



MoEnCo's 2024 Corresponding Protection program completed the following through contracting only the local businesses:

- **Rehabilitation of 14 hectares of damaged and abandoned land:** following a proposal of the provincial Environmental Office and Bulgan soum, our team comprising nine members completed technical rehabilitation of 14.04 hectares of land in two locales of Bulgan soum in over 300 kms from Khushuut. These two locales belong to the Great Gobi State Protected Area, but were damaged by occasional unauthorized small-scale gold mining. Our team cooperated with the Ecological Service of Bulgan soum police, and Administration of Section "B" of this nature reserve for their professional guidance, and completed leveling and filling of the damaged areas, removal of debris and shaping the surface. The restored lands were thereafter handed over to the Bulgan soum administration. Total acreage of lands rehabilitated by MoEnCo outside its mining licence areas over the period of 2018-2024 were 74.4 hectares in five soums.
- **Protecting natural springs:** it is vital in the arid region of Khushuut for guarding valuable drinking water sources against damage and pollution by grazing domestic, wild animals and reckless driving over. For drinking water, our environmental team erects new railings, repairs and maintains fences, pathways and cameras, where fixed, etc., around natural springs in the area. In 2024 the team arranged fencing and wiring of three natural springs in three soums and commissioned the work to the soum administrations.
- **Supporting local residents in their land cultivation:** similar to the above, fencing of remote lots in cultivated lands is important for protecting crops against grazing by domestic and wild animals and against reckless driving over. In 2024, MoEnCo offered financial support to Darvi soum households to fence out total of around 100 hectares of vegetable land parcels.
- **Restoration of local dumpsites, creating new community landfills:** at the request of Altai soum administration, technical rehabilitation was carried out on a 5-hectare area landfill of this soum center in June 2024. The works involved containing and shaping the existing waste, capping and sealing the surface, transforming the landfill into usable land, building pathways around and forming new landfill pits of 3-4 meters deep whereupon the completed works and areas were commissioned to the soum administration. Total acreage of landfills restored by MoEnCo over the period of 2018-2024 were 122.7 hectares in five soums.
- **Distribution of fodder for wildlife:** biotechnical wildlife protection measures were carried out jointly with environmental staff and rangers of Tsetseg, Uyench and Darvi soums. They distributed total of three tonnes of saline fodder and 720 bales (or approximately 18 tonnes) of hay over various locations on hill slopes and wildlife pastures to support the local wildlife to overcome harsh winter.
- **Monitoring of wildlife migration routes:** in June 2024, jointly with the local protected area administration and Khovd Environmental Office we installed three movement sensitive cameras along the Khushuut road to monitor the wildlife routes for making make adjustments to our coal transportation schedules in the future. For this purpose, we obtained Bestquarder brand cameras from a local supplier, and identified the most suitable spots for installation. The data of these cameras are being analyzed every three months.
- **Working with voluntary rangers:** MoEnCo selected and builds professional capacity of eight voluntary resident rangers who are local herders. In the previous years, we involved some of them in training at Khovd province center and presented GPS trackers, binoculars and warm winter uniforms. Voluntary resident rangers not only contribute to protection of local nature parks but also have become a part of MoEnCo's conservation efforts through participating in our biodiversity surveys, practical works in winters, patrolling the MoEnCo's corresponding protection program areas and building awareness among local people.

ENVIRONMENTAL (CONTINUED)

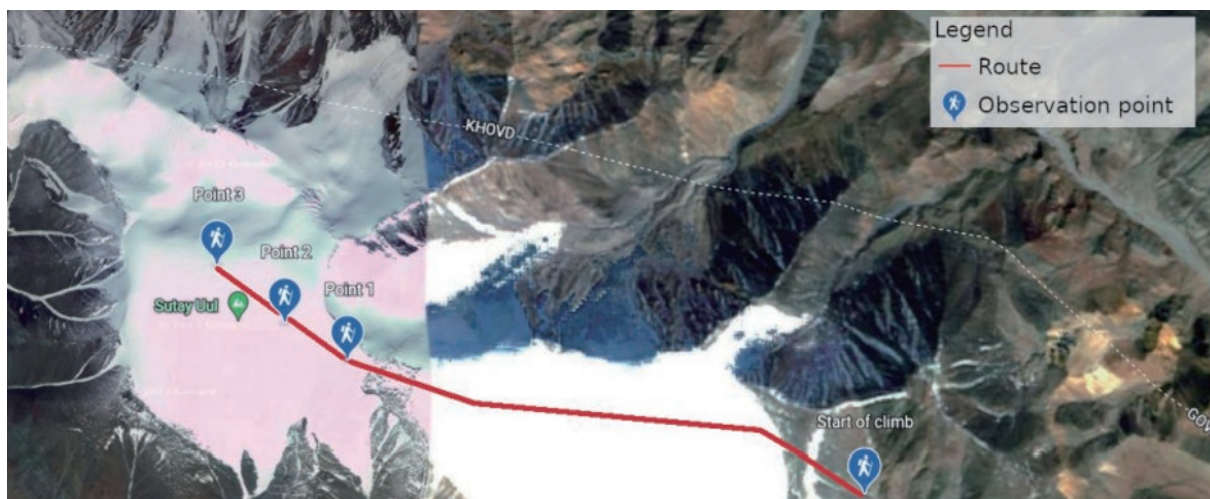
- **Cleaning and protecting the headwaters:** in warmer seasons of the year, pristine drinking waters of Khushuut river and nearby natural springs attract not only herding families for camping and grazing their livestock there but also outings of tourists resulting in accumulation of trash. MoEnCo took it upon itself to regularly clean the area. For example, from May to October 2024, these water points around the mine were cleaned once every 14 days, about 10 tonnes of trash were collected, sorted, and delivered to a centralized waste disposal point at soum center.

The MoEnCo's Corresponding Protection program does not contemplate to expand the current size of the rehabilitated lands under this program. Instead, the plan is to diversify the program activities within the land area. For example, measures in the first Corresponding Protection program of 2016 – 2018 included (i) planting trees and bushes; (ii) fencing agricultural and gardening land parcels as protection against grazing animals; (iii) landscaping works and greening with grass seeds and local vegetation along local roads and settlements; and (iv) training session for local residents involved in our green efforts during which various soil works techniques, watering and tree planting procedures as well as general environmental protection awareness were taught. Now, in addition to these "regular" activities, the current Corresponding Protection Program includes long-term, targeted programs such as:

- The Bulgan river beaver protection program that started in 2019.
- Sutai Mountain Glacier Monitoring Program that initially started in 2020 and was formalized by a collaboration agreement in March, 2021.
- "One Million Trees" program which is a part of the nation-wide "One Billion Trees" movement which MoEnCo joined in November, 2021.

Collaboration with the Sutai Mountain state protected area administration

The remote, rugged and sparsely populated hill lands surrounding the Khushuut mine site serve as an important habitat for diverse local ecosystems and a source of a number of creeks and rivers. This is why the provincial nature reserve called Sutai in close proximity (20 kms) to our mine site was upgraded to the category of a state protected area in 2018. Since then, MoEnCo has been closely working with the administration of this strictly protected area. In the past, we funded works of making and installing 40 demarcation pillars on borders of the protected area and five information boards, and also a training workshop for park rangers on preventing illegal hunting, improving the community network to monitor such hunting, and building capacity of voluntary resident rangers. In March 2021, MoEnCo entered into agreement with the Permafrost and Atmospheric Research Center, a non-profit professional research institution, to carry long-term joint research to determine a current status and changes in glaciers, snow cups and erosion of sloped of Sutai mountain. The Permafrost and Atmospheric Research Center carries a research of Sutai, Munh-Hairhan, Harhiraa and Turgen mountains which are ecologically connected, magnificent massifs in the far western part of Mongolia. The agreement with this Center contemplates to climb the top of Sutai (which makes about 25 kms round hike) twice a year and make air quality and snow cover measurements. Joint teams with four to nine professionals of this Research Center, MoEnCo and Huisiin Gobi – Tsetseg Lake Watershed Area Administration (the regional water authority) including hydrogeologist, GPS specialist, environmental expert, etc., established three observation points at various positions on the slopes, measured PM_{2.5} and PM₁₀ particles in 2021-2024 using the latest professional equipment. MoEnCo's two geologists and senior hydrogeologist conducted particles tests at Sutai in June and October 2024. Measurements in the above three locations on the mountain all showed no air contamination and that content of particles are within the limits of the national MNS 4585:2016 (Air quality. General technical requirements) standard.



ENVIRONMENTAL (CONTINUED)

MoEnCo's contribution to the national "One Billion Trees" movement

Realizing the importance of reducing GHG emissions from the mine, MoEnCo already planted over 60,000 trees and bushes in the mine vicinity, Khovd province center, along the Khushuut road, Bulgan river basin and the relevant soums over period of 2014-2024. We hire only local residents and professional companies for full-time or seasonal jobs of planting and maintaining our trees. Based on this experience and appreciation from the soums, MoEnCo joined the campaign called "One Billion Trees" initiated by the President of Mongolia in 2021. Now MoEnCo not only nurtures its thousands of seedlings planted in the past years, but also collaborate with local plant nurseries and support their growth. In 2023, two new tree breeding enterprises of Khovd received substantial financial and technical assistance to increase their professional capacity and green stock.

	2016-2021 as part of the Corresponding Protection Program	2022-2024 as part of "One Billion Trees" national movement	Total in 2016-2024
No. of districts involved	4	6	6
No. of trees planted and nurtured	40,000	70,200	110,200

Almost half of Mongolia's population concentrates in the capital city metro area, causing a serious air and land pollutions. Thus, the capital city Governor's office works with reputable companies headquartered there to converge their participation in the "One Billion Trees" movement to support the greening efforts in Ulaanbaatar vicinity. Within this program, MoEnCo carried out afforestation and hedge protection work through planting 50,000 coniferous and deciduous tree seedlings on a 20-hectare area of forest that was damaged by pests, in the Zalaat gorge of the Bogdhan mountain in the southern part of Ulaanbaatar. In May 2024, we entered into a three-year contract with AgroForest LLC, a professional forestry company, to maintain and cultivate MoEnCo's seedlings site in the capital city. This is the third professional forestry company with which MoEnCo works to maintain its planted seedlings stock. Currently, our environmental team is preparing a long term plan of the tree planting works which would have a more scientific base for a choice of sites, types of trees and bushes to plant, maintenance schedules, etc. and, on the other hand, such approved plan is expected to ensure better internal long-term budgeting.

The beaver protection program

Launched in 2019 upon discussions with relevant soums, this program is being carried out 320 km away from the Khushuut mine but along our coal export road. Due to increased human activities over the past decades and the changes in local vegetation and river flow patterns caused by the climate change, Bulgan river beaver population has been decreasing. Through this program, MoEnCo expects to support beaver population and also to have long term effect on the Bulgan river ecosystem as a whole. In the past, we donated 1,500 young trees to the Uyench-Bodonch-Bulgan River Basin Administration for planning in the beaver habitat, fencing materials for protection of beaver nest areas against grazing wild and domestic animals, phosphorescent warning and information boards and erected them along the Uyench, Bodonch, Bulgan and Barlag rivers special protection zones.

ENVIRONMENTAL MANAGEMENT AND PERFORMANCE AT XINJIANG WASHING PLANT

Coal quality control is an indispensable segment in the production process. We built the DPP at the Khushuut mine site for initial processing of coal before export. This could not only eliminate the unwanted rubbles and other materials to enhance our raw coal quality, but also reduce our export transportation costs. The processed coking coal is then washed by our Xinjiang Washing Plant in China and sold as clean coking coal to our customers. Coal washing is a process that is undertaken in a coal washery or coal washing plant where coal is refined or cleaned of impurities. Coal washing involves using water, mechanical techniques and relies on gravity and the difference of density between coal and its impurities which are usually more densely packed due to the fact that they are inorganic.

Main features of the Xinjiang washing plant

Our coal washing plant is located in Qinghe County, Xinjiang, some 30 kilometres from the Xinjiang Takeshiken border. It has a gross area of 200,000 m², and comprises the main plant and production area, the raw coal yard, and the office and living quarters. The main plant and production areas include clean coal bunker, waste rock bunker, preparation workshop, filtration workshop and sedimentation facilities, etc. It was commissioned by end of 2014. The annual washing capacity is three million tonnes.

Coal storage and disposal

After the washing plant received the raw coal from Mongolia, the coal is placed in the raw coal yard of 63,300 m² surrounded by the dust suppression wall including the enclosed raw coal bunker of 23,000 m² where raw coal is mainly stored and pending for processing. Clean coal is produced after the raw coal has gone through various mechanical screening, filtering and washing processes. Clean coal is then temporarily stored in the clean coal yard for delivery to our customers.

Waste disposal and energy consumption in the production process

Under the clean coal production process, it involves energy and water consumption and generates sewage and solid waste including hazardous and non-hazardous wastes.

Sewage disposal

Sewage is produced from flowing water, spraying, flushing and cleaning machines and facilities in the production process. With the sewage treatment system, it forms a closed-circuit circulation for re-use in the washing plant with no discharge to the outside. Therefore, it ensures no harm to the surrounding environment. For domestic sewage, the sewage undergoes waste water treatment before storing in a tank for winter which is used for irrigation in summer and greening. If sewage is produced due to equipment failure or other incidents, it is stored in the standby thickening tanks to ensure no discharge to the outside to affect the environment.



ENVIRONMENTAL (CONTINUED)

Waste disposal

A certain amount of non-hazardous coal gangue with sludge is screened out under the coal washing process, and the majority of which is used as raw materials for construction while the remaining would be piled up temporarily in an interim yard and sent out for rehabilitation of open-pit mines later and further to proceed towards pasture restoration. Wastes such as hazardous ash also generated under the coal washing process. Used industrial oil of hazardous waste would be stored in a hazardous waste warehouse. We frequently arrange respective specialized waste recyclers to collect the wastes for proper disposal. The table below shows the washing capacity, total amount of major energy and water consumed, hazardous wastes and non-hazardous wastes produced from our washing plant at Xinjiang during the Financial Year:

	2020-2021	2021-2022	2022-2023	2023-2024	2024-2025
Raw coal for washing (tonnes)	905,300	1,231,700	2,112,800	2,629,892	3,023,600
Clean coal production (tonnes)	723,000	870,100	1,474,700	1,865,535	2,147,300
Electricity consumption (kWh)	7,220,079	9,589,335	14,776,187	14,406,049	17,137,275
Intensity ♦	7.98 kWh/t	7.79 kWh/t	6.99 kWh/t	5.48 kWh/t	5.67 kWh/t
Water consumption (m ³)	113,987	128,297	268,783	169,092	195,409
Intensity ♦	0.13 m ³ /t	0.10 m ³ /t	0.13 m ³ /t	0.06 m ³ /t	0.06 m ³ /t
Total hazardous wastes (tonnes)	2.5	5.04	2.1	8.0	4.56
Intensity ♦	0.0000028 t/t	0.0000041 t/t	0.0000010 t/t	0.0000030 t/t	0.0000015 t/t
Total non-hazardous waste (tonnes)	264,795	371,253.87	603,160	774,585.98	779,916
Intensity ♦	0.29 t/t	0.30 t/t	0.29 t/t	0.29 t/t	0.26 t/t

- ♦ Intensity is calculated based on the total amount of raw coal received by the washing plant for washing during the Financial Year.

The Indirect GHG emissions in tonnes of CO₂ equivalent by the washing plant in the coal washing process through the use of electricity was 9,195.86 tCO₂e.

Environmental performance

During the Financial Year, various environmental inspections took place in our washing plant. We engaged an environmental agency, Xinjiang Runkai Environmental Protection Engineering Co., Ltd. to carry out an environmental inspection on our clean coal bunker in April 2024, sampling and monitoring points were set around the project area. The inspection mainly covered five aspects: occupational exposure to industrial dust (including total dust and respirable dust), nitrogen oxides (nitric oxide, nitrogen dioxide), radiation and noise. All aspects passed the inspection.

In addition, a regular check was conducted on lightning protection and safety system in March 2025 by a private agency in accordance with the applicable laws and regulations. All items passed.

Apart from the general environmental protection measures, we also took certain additional approaches to reduce the impact of the washing plant's operation to the environment:

- i) In response to dust, we had tried to apply the automatic unloading system to our operation in recent years. If the automatic unloading system is fully adopted, dust is estimated to reduce by more than 95%.
- ii) To reduce energy consumption by improving our five dewatering screens. The electricity consumption was reduced from 45kW to 37kW per screen.
- iii) Formulated a hazardous waste management plan in accordance with the regulations of Xinjiang to ensure proper disposal of hazardous waste. We also appointed an organization to work out a "Gangue and Coal Slime Reclamation, Mining Geological Restoration and Land Reclamation Plan" and it obtained the approval from relevant natural resource bureau of Qinghe County.
- iv) Planting 1,372 trees and seeding 900 m² of grass during the Financial Year. We will continue to do greening work in our washing plant every year.

ENVIRONMENTAL (CONTINUED)

ENVIRONMENTAL PERFORMANCE OVERVIEW

ESG KPIs	Unit	2020	2021	2022	2023	2024
Use of Resources						
Electricity consumption	kWh	11,466,657*	14,847,475*	21,422,177.17*	22,181,917*	23,796,457*
Intensity	kWh/t	7.97	8.09	6.1	3.8	2.59
Water consumption	m ³	190,680*	301,878*	462,710*	359,303*	394,374*
Intensity	m ³ /t	0.13	0.16	0.13	0.06	0.04
Diesel consumption	L	1,130,000	1,270,000	1,570,000	2,280,000	2,280,000
Intensity	L/t	0.79	0.69	0.45	0.39	0.25
Emission Management						
SO ₂	µg/m ³	The test result is within the Mongolian Standard♦	No emission measurement was conducted due to the COVID-19. For details, please refer to the "AIR EMISSION MONITORING" sections in Environmental Social and Governance Report 2022.	The test result is within the Mongolian Standard#	The test result is within the Mongolian Standard△	The test result is within the Mongolian Standard*
NO ₂	µg/m ³	The test result is within the Mongolian Standard♦		The test result is within the Mongolian Standard#	The test result is within the Mongolian Standard△	The test result is within the Mongolian Standard*
PM _{2.5}	µg/m ³	Above the permission level ♦		Generally high#	Detectable in sampling locations and above the permissible level at some sampling locations△	Detectable in sampling locations and above the permissible level at most of the sampling locations*
PM ₁₀	µg/m ³	Above the permission level♦		Generally high#	Detectable in sampling locations and above the permissible level at some sampling locations△	Detectable in sampling locations and above the permissible level at most of the sampling locations*
Heavy metals	µg/m ³	The test result is within the Mongolian Standard♦		Some of the contents were either minimal or undetectable in sampling locations#	Some of the contents were either minimal or undetectable in sampling locations △	Some of the contents were either minimal or undetectable in sampling locations but all is in compliance with the Mongolian Standard*
GHG emissions (Scope 1)	Tonne CO ₂ equivalent		24,246.39	88,107.80*	99,714.83*	109,659.85*
GHG emissions (Scope 2)	Tonne CO ₂ equivalent	–	6,730.79*	9,785.44*	9,745.75*	11,234.28*
Total GHG emissions	Tonne CO ₂ equivalent	–	30,977.18	97,893.24*	109,460.58*	120,894.13*
Total hazardous wastes	t	2.54*	5.11*	2.25*	8.11*	4.74*
Intensity	t/t	0.0000018	0.0000028	0.00000064	0.0000014	0.0000005
Total non-hazardous wastes	t	266,141.3*	372,047.57*	604,142.9*	775,568.88*	781,486.3*
Intensity	t/t	0.18	0.20	0.17	0.13	0.09

* Including the data in the operation in the Company's washing plant in Xinjiang, China during the respective financial year.

♦ Measurement and test were conducted annually pursuant to the Mongolian law and the test was taken in the period from 22 December 2020 to 27 December 2020.

Measurement and test were conducted annually pursuant to the Mongolian law and the test was taken in the period from 2 March 2022 to 8 March 2022.

△ Measurement and test were conducted annually pursuant to the Mongolian law and the test was taken in the period from 25 November 2023 to 28 November 2023.

• Measurement and test were conducted annually pursuant to the Mongolian law and the test was taken during the days in July and October 2024.

SOCIAL



SOCIAL (CONTINUED)

EMPLOYMENT PRACTICE, WELFARE AND BENEFITS

The Group takes each of its employees as a valuable asset. The Group is an equal opportunity company and all employees are treated with respect regardless of their age, gender, marital status, disability, race, citizenship and religion.

Our remuneration packages to employees are structured to take into account the level and composition of pay and the general market conditions in the respective geographical locations and businesses in which the Group operates. The remuneration policies of the Group are reviewed on a periodic basis. The Group respects the legitimate rights and interests of all its diverse employees. We adhere to labour laws, employment practices and business ethics of the different locations where we operate.

As at 31 March 2025, the Group had a total of 876 staff.

	Hong Kong	China	Mongolia
Headcount*	33	341	502
By gender			
Male	45.45%	81.23%	83.07%
Female	54.55%	18.77%	16.93%
By age group			
25 and below	0%	8.80%	15.54%
26-35	9.10%	30.80%	40.04%
36-45	24.24%	33.72%	26.49%
46-55	33.33%	21.11%	14.54%
55 and above	33.33%	5.57%	3.39%
By employment type			
Full-time	97.06%	100%	97.86%
Part-time	2.94%	0%	2.14%

Employee Turnover Rate*	2024	2025
Total employee turnover rate:	25.51%	17.19%
By gender		
Male	13.69%	17.34%
Female	13.46%	16.56%
By age group		
25 and below	51.76%	28.57%
26-35	29.13%	21.67%
36-45	14.90%	13.48%
46-55	18.18%	11.04%
55 and above	22%	12%
By region		
Hong Kong	Nil	17.14%
China	33.33%	21.19%
Mongolia	21.76%	14.29%

* Full time employees and excluding contractors' employees

MoEnCo contributed a significant number of jobs at Khushuut operations to Khovd province residents. As of end of March 2025, the employment data for the entire Khushuut project were:

Khushuut project	
Total number of people working at Khushuut operations (including part-time, temporary and contractor's employees)	1,906
MoEnCo's employees working at Khushuut operation	
percentage of people working at the mine site	92.79%
percentage of local people hired	80.70%
men and women ratio at the mine site	85/15
men and women ratio at top management position	2/3

Mongolia enforces stringent labour legislation and standards in line with the best international practices. MoEnCo has strictly complied with all requirements of Mongolian labour regulations. MoEnCo has effective policies and practices not to employ child and forced labour. All terms and conditions under labour contracts are consistent with the Labour Law, Occupational Safety and Sanitary Law, Social Insurance Law and other relevant laws. In addition, we also require our contractors and suppliers to comply important issues including strict compliance of Labour Law and standards.

In 2024, the provincial labour inspectors visited our Khushuut coal mine site as a part of the government inspection when they not only scrutinized whether MoEnCo's operations had complied with the labour and safety regulations but also held discussions with our mine and camp workers upon which a positive assessment of our labour conditions and practices was given.

MoEnCo's job vacancies are regularly announced through its website, social media pages and Khovd media sources. Moreover, we actively participate in and sponsor the Khovd Job Fairs organized by the Khovd province Government.

SOCIAL (CONTINUED)

MoEnCo has duly paid social security and health insurance premiums to all of its employees in accordance with the relevant laws. In addition to covering all MoEnCo's workers and staff with mandatory Mongolian government social insurance (which includes health insurance, unemployment, old age pension, welfare, and industrial accidents insurance), we additionally subscribe all our workers to the voluntary "employer's liability" insurance under the private insurance schemes which provide a good level of extra coverage for potential medical expenses and lost wages of our employees, or their beneficiaries, if the employee is injured, sickened or killed by job-related causes. Moreover, it is also our requirement that all MoEnCo's contractors and suppliers to take out, at the minimum, mandatory government social and health insurances for all of their employees.

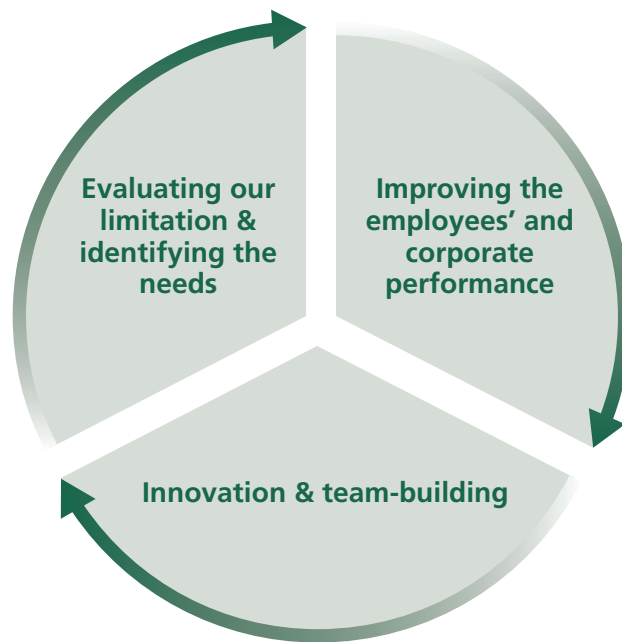
During the reporting period, no complaints related to harassment, discrimination or human rights were recorded at MoEnCo, its workers union or with the provincial labour inspectors where any worker has a right to complain as set out in the relevant laws.

In 2024, one MoEnCo's employee became the "Honorary Miner" as nominated by the Ministry of Mining and Heavy Industry, six people received the top government medals for their outstanding work in the mining industry of Mongolia, and six people received other distinctions from the Government and notable professional industry associations while MoEnCo paid cash prizes to 32 workers. MoEnCo enforces an internal regulation about aid to its employees under which 14 workers or their families received cash assistance for medical emergency or overcoming some life circumstances. Adhering to the new provisions of the Labour Code, effective from January 2022, MoEnCo made notable changes in its camp workers shifts and rosters which are now more favorable to the camp workers.

People working at Khushuut mine, including employees of MoEnCo and its contractors enjoy active social life at Khushuut camp through engaging in various artistic and sports events organized at the camp, community or at provincial and national levels. For example, Khushuut camp has always been one of active participants and a sponsor of the Ice Festival, one of the main winter social events of Khovd province. MoEnCo co-sponsored the Mining Cultural Fair organized by Mongolian National Mining Association in November 2024. Our team of artistic enthusiasts participated in various events of this Fair and three of them, an electrician of DPP, transportation executive and accountant, received awards in the Miners' Talents Show. On the occasion of the International Children's Day, MoEnCo organized the "Happy Childhood" event for children of its local employees in early June 2024, in Jargalant, Tsetseg and Darvi soums reaching out to about 750 local children. At our invitation, professional artistic troupes from Khovd province and capital Ulaanbaatar performed creating memories and joy for children. In May 2024, a large group of MoEnCo's athletes participated in seven sports disciplines in the Miners' Sports Match, a multi-sport competition organized by the Mongolian National Mining Association as part of its 30th anniversary celebration with attendance of about 800 competitors from more than 40 mining companies.

TRAINING AND DEVELOPMENT PROGRAM

The Group continues to invest in training and development to enhance employee's the performance and promote personal self-fulfillment. The Group's training program is based on the following values:



The Law of Mongolia on Occupational Safety and Health and other relevant laws impose a number of obligations on MoEnCo as a mining licence holder and employer, to provide safety and health training to its employees. MoEnCo's comprehensive training program meets the requirements imposed by these Mongolian laws, regulations such as the Procedures for Conducting Labor Safety and Hygiene Training and Exams approved by the order No. A/370 of the Minister of Labor and Social Welfare of December 13, 2019, and the standard MNS 4969:2000 (Occupational safety and health. Organization of training. Main rules). These regulations enforce certain ratios and minimum hours of training depending on the specifics of a workplace. The training plans and performance reports are presented to the Government as part of MoEnCo's annual reporting.

SOCIAL (CONTINUED)

We offer training free of charge to (i) our staff and (ii) the contractors' staff. We aim to train and develop our people through an array of educational methods:

MoEnCo's training and personal development structure



MoEnCo's training and personal development program	2020	2021	2022	2023	2024
Number of internal safety training topics covered	31	28	28	38	38
Number of attendees	4,704	1,768	5,220	7,428	8,261
Total hours of training offered	5,075	1,864	5,478	6,498	12,098
Average training hours completed per					
Khushuut mine site employee	14.7	4.85	13.6	17.27	25.25
Average training hours					
(including MoEnCo headquarter office staff)	13.4	4.51	12.5	16.25	23.8

When organizing training and development activities, MoEnCo collaborates with various professional organizations and certified training institutions or involves its staff and workers in their events. Under the 2024 training and development program, MoEnCo collaborated with the Khovd province Emergency Department, OSHMI Academy and Human Safety Academy (professional training institutes), reputable chemical laboratory and several other private bodies.

Total of 312 MoEnCo's employees participated in seven external training programs in 2024 on topics of insurance contracting, payments and procedures, operational safety of coal processing plant, advanced rescue procedures in remote settings, training of volunteer lifeguards and firefighters, hazardous chemicals handling, safe operation of pressure containers and pipelines, capacity building for occupational safety and health managers, and so on. By offering our employees training opportunities for personal and professional development, we ensure safety and create a learning culture that benefit the Group as a whole.

OCCUPATIONAL SAFETY

Mining is a complex operation that presents dangers and therefore requires alert, healthy workers while the isolation in which the Group operates its Khushuut mine requires additional resources and strategy to enforce effective occupational safety and health management (“**OSHM**”) program.

MoEnCo provides the occupational health and safety through the following strategies:

- Running the systems for identification, monitoring and preventing of known or unknown hazards at work places where this system is an amalgamation of the organizational unit responsible for OSHM, approved safety procedures and allocation of sufficient budgets for the OSHM measures.
- Developing, approval, periodic reviews and strictly enforcing of the internal safety regulations and procedures at all levels.
- Approving and reporting on the realization of annual occupational safety and health (“**OSH**”) plans.
- Training, supervision, advice and feedback on safety compliance at all levels.
- Pre-employment health screening, annual health checks.
- Provision of medical services and health surveillance and treatment of illness and injury at the area with most occupations hazard. i.e. directly at the Khushuut mine site.
- Monitoring of health and safety parameters at each workplace.

In 2024, MoEnCo’s OSHM team consisted of 27 professionals working full-time at the mine site. In addition to their regular work ensuring the mine’s safe operations, this team conducted work place safety inspections at the mine site and camps of MoEnCo and of its six contractors having their own camps at Khushuut. The team conducted 87 workplace safety inspections both at MoEnCo’s mine site and the contractors’ workplaces and 365 inspections of heavy machinery and vehicles operating at Khushuut. Daily, weekly, bi-monthly or monthly workplace inspections are conducted by supervisory staff and safety officers to identify potential workplace hazards, assess safety risks, and immediate actions are taken to correct any activity deviated from the policies and procedures. For example, the temperature, humidity, lighting and noise levels are measured and recorded monthly at every workplace at the camp. These measurements are performed in compliance with a number of mandatory mining and industrial safety standards, for example MNS 6437:2014 (Occupational safety and health requirements in the mineral processing industry) or MNS 6767:2019 (Occupational safety and hygiene. General requirements for measuring the lighting at a workplace and its permissible limits). Measurements are made with the Vital Environmental Meter EM5 and compared to the parameters of the relevant safety standard requirements. Lagging and leading indicators are adopted to measure the health and safety performance on a monthly basis.

Main indicators of MoEnCo’s occupational safety performance					
Khushuut coal mine	2020	2021	2022	2023	2024
Total MoEnCo’s man-hours worked	2,760,200	3,886,907	4,636,758	5,266,931	5,243,668
No. of fatalities	0	0	0	0	0
No. of lost time (hour)	1	1	2	4	7
Injury frequency rate	0	2.83	4.88	6.07	4.58
Total recordable injury frequency rate	0	6.94	15.10	19.93	15.26

SOCIAL (CONTINUED)

The director of Khushuut mine amended the uniform policy in 2023. By the amended policy, all workers including contractors inside Khushuut mine should mandatorily and properly wear specific uniforms and protection gear in different occasion, site and seasons. In line with the amended policy, uniforms and protection gears were renewed and improved in 2024 according to the new rules.

The OSH team at Khushuut mine site also includes full and part time OSH managers of MoEnCo’s contractors. MoEnCo’s safety team together with the doctors and nurses of the Khushuut medical center regularly organizes meetings and consultations with these managers and offers them additional and more vigorous training for compliance with not only the OSH laws and regulations but also MoEnCo’s own safety requirements. As of early 2024, all 26 transportation companies that MoEnCo contracts to carry its coal, employ full time OSH managers and two other contractors have general physicians on their payroll. MoEnCo’s OSH team collaborates with them in ensuring safe operations at the mine. MoEnCo’s contracts with large service providing companies mandatorily include (i) labour safety and compliance provisions and liabilities for safety violations or violations of worker’s rights; and (ii) duty to engage a full-time or part-time OSH professional.

OSHM is an important part of the annual Government’s assessment of MoEnCo’s environmental and safety performance conducted through the Khovd province administration. Main indicators of the safety performance are mandatorily reported to the Government as part of the MoEnCo’s annual reporting.

EMERGENCY RESPONSE AND READINESS

Our Khushuut mine site has strong on-site emergency response and mine rescue capability that fit its large volume of operations, difficult mountainous terrain, specific working environment and potential technical risks.

In 2024, MoEnCo emergency response team (**ERT**) consisted of three full-time professionals, two technical staff and 19 trained volunteers who are employees of MoEnCo and its contractors. The team offers 24-hours readiness and emergency response which is well beyond the Disaster Preparedness Law and other relevant laws and regulations require. They have been consistently receiving various “Best in Industry” nominations and prizes at regional joint drills and practical training and demonstration sessions in the past. Our ERT is equipped with the latest communications and tracking systems, personal protection gears, uniforms and fire extinguishing equipment, vehicles and machines.

A mine emergency response plan is a valuable organizational tool for preparing personal response to a mine emergency and is a requirement under the Mongolian law. Under the Disaster Preparedness Law of Mongolia and other relevant laws and regulations, MoEnCo prepares the Disaster Prevention Plan and Disaster Management Plan annually and has them reviewed by the Mine Rescue Office of the National Emergency Management Agency of Mongolia. Before issuing a statement, representatives of the Mine Rescue Office, including a state inspector, visit Khushuut annually and inspect the camp against disaster readiness. The Khushuut mine administration distributes copies of the Emergency Response Plan to all internal units and contractors at the mine site.

MoEnCo emergency response program data	2020	2021	2022	2023	2024
Total hours of disaster readiness & response training offered	116	0	158	162	170
No. of calls to incidents at the mine	10	7	8	8	10
No. of calls to incidents on the Khushuut road or in the community	12	26	4	12	15

Our ERT is in charge for fire safety throughout the Khushuut mine and works closely with provincial and soum fire inspectors. Together with the OSH managers or local fire inspectors, the ERT professionals regularly participate in weekly, monthly and quarterly inspections of various facilities and vehicles at the mine against fire safety, performs tests and inventories, and so on. Because MoEnCo operates in remote area with very low and sparse population, MoEnCo provides free emergency response to local incidents every time they call for help, and occasional incidents on our Khushuut road. For instance, in 2024 our ERT was called to four occasions of steppe fire in the neighboring soums.

In previous years, the ERT regularly participated in events and training held by the General Authority for Emergency of Mongolia and the Emergency Office and Fire Department of Khovd province. For example, in 2024 MoEnCo organized the following events and assumed all expenses for:

- 170 hours of mandatory training on fire and disaster prevention and readiness, first aid, emergency response and procedures for employees of MoEnCo.
- Two-day intense training for 20 ERT members organized on the camp with multi discipline professional trainers of the General Authority for Emergency of Mongolia and the Emergency and Fire Department of Khovd province. The goal of this training was to enhance the MoEnCo's self-sufficiency in a major disaster situation through developing multifunctional teams and cross training in emergency response skills. The training consisted of class sessions and practical drills upon successful completion of which the participants received competency certificates.

NOISE CONTROL AND REDUCTION MEASURES

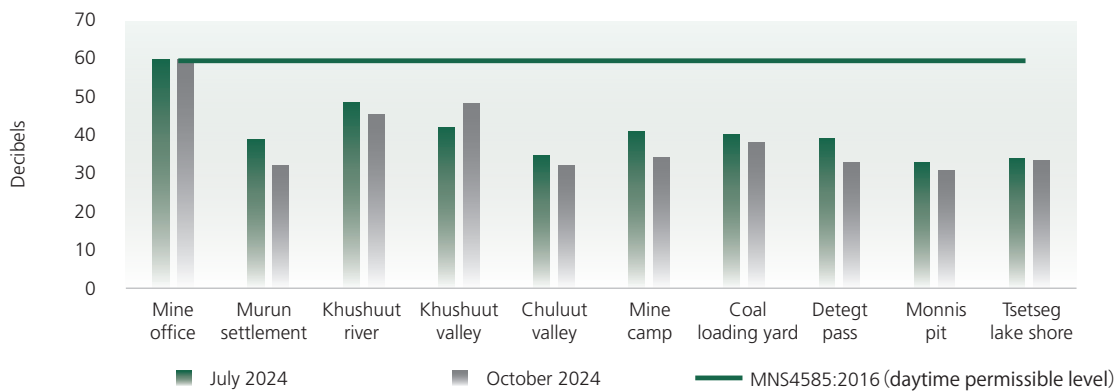
Eliminating or reducing excessive noise at work is not simply an employer's responsibility. It is the Group's interest to provide a safer and healthier working environment that would inevitably lower the probability of accidents and under-performance. As in most other heavy industries, mining can expose workers to certain levels of noise. Drills, crushers, mills, and some other items of mining and mineral processing at Khushuut are inherently noisy. MoEnCo's noise control and reduction measures include:

- **Understanding noise in the mining industrial setting** – Excessive noise in industrial environments can cause failure of regulatory compliance, threaten workers' well-being and diminish their productivity, contribute to environmental noise pollution and jeopardize community relations.
- **Source and types identification and risk assessment** – MoEnCo's environmental team monitors and measures noise sources and levels and reports them to the Government as part of MoEnCo's comprehensive Environmental Management Report. Such measurements and risk assessment allow us to define the actions which need to be taken to continuously meet the standard requirements for noise exposure. In 2024, the noise measurements were conducted by using SL-5868P Portable Sound Level Meter and Noise Grader at five different locations at Khushuut mine site, each of which also had 7–36 measurement points at each location, the total number of measuring points were 61. Our measurements show that the DPP's machinery operations, drilling and heavy duty trucks are the main sources of the increased noise levels at Khushuut mine.

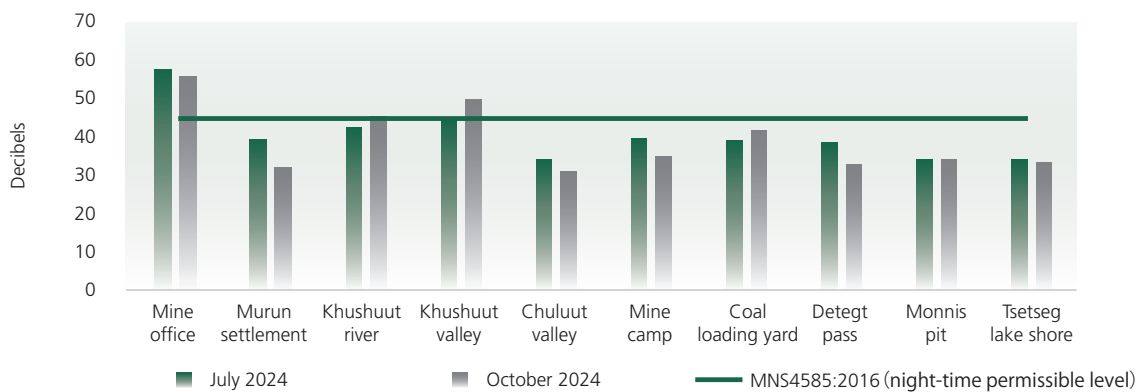
SOCIAL (CONTINUED)

In addition to regular internal monitoring of noise levels of the Khushuut mine operations, MoEnCo hires an independent licenced appraiser for measuring and professional recommendations for reduction and mitigation. In July and October, 2024, our independent appraiser Green Asia Consulting LLC measured the Khushuut mine noise levels at 10 points within 12 km radius, and concluded that we were on good regulatory standard.

Day time noise levels at Khushuut mine



Night time noise levels at Khushuut mine



- **Internal safety procedures in effect** – noise exposure and reduction matters are regulated the MoEnCo's Internal Regulations and Rules of Khushuut camp as well as in a number of approved internal safety procedures. MoEnCo's safety team ensures due enforcement of these procedures at the camp.
- **Personal protective equipment** – MoEnCo workers are strictly required to wear uniform with all the mandatory personal protection equipment and the part of which are ear plugs. Workers in noise intensive area are required to wear industrial ear plugs.
- **Noise pollution and prevention training and awareness building:** all people of MoEnCo and its contractors at the mine camp attend regular practical training on noise awareness and prevention skills and requirements.

- **Government inspection** – MoEnCo’s noise control and management is also a part of the annual government inspection carried through the Khovd province Governor’s Office. All noise measurement results are presented to the relevant authorities as part of MoEnCo’s annual environmental and OSH reporting.
- **Free annual hearing exams** are given to all MoEnCo’s employees working at Khushuut as part of annual health checkups.

MEDICAL CARE FOR OUR WORKERS AND THE COMMUNITY

In compliance with the legal requirements, all of our site employees undertake pre-employment medical examination to ensure that they are fit to perform their jobs safely without placing co-workers at risks. Subsequent extensive medical checkup is conducted bi-annually or annually subject to specifics of jobs to ensure that no health issues and occupational diseases were contracted as a result of operational activities. All costs for such pre-employment and annual medical checkup are borne by MoEnCo. In 2024, MoEnCo’s 441 employees underwent annual medical checkups with services provided by a hospital in capital Ulaanbaatar and one in Khovd province center.

Our Khushuut coal mine has one of the best equipped and modern health centers in the area which is operated by our subcontractor EmMed LLC and provides free medical services to (i) MoEnCo employees; (ii) all contractors’ employees at the Khushuut mine site and Uyenich camp; (iii) export coal truck drivers on the MoEnCo’s Khushuut road; (iv) as well as local residents. Our Khushuut mine site is located in a remote part of Mongolia among Altai mountains with very low population density, few settlements and even fewer medical facilities. MoEnCo gives support to local communities by offering free health care services, transporting the sick and pregnant to the provincial hospital and providing aids for accidents, if any, on our Khushuut road. The hospital provides free primary health care, vaccination, medical emergency response, stabilization, treatment, and first aid training to MoEnCo’s and contractors’ employees. MoEnCo’s medical and OSH teams played the main role in preventing from and responding to the contractible disease.

As of end of February 2025, MoEnCo’s medical team working at Khushuut consisted of four doctors and two nurses who offer 7/24 services. Since launch of operating at Khushuut mine in August 2013, our medical team examined over 155,214 patient visits.

Number of visits to MoEnCo’s medical center	2016-2020	2021	2022	2023	2024
Visits/calls/checks of the MoEnCo’s and contractors’ employees	29,915	41,838	39,857	7,442	6,217
Visits/calls/checks of local residents	1,050	96	88	106	58
Calls to accidents on Khushuut road	21	1	3	3	6

The medical services to local residents notably decreased starting from mid-2019 and continued through 2020-2023 because the Khushuut village, which used to be in the vicinity of our mine site, had been moved along all its residents to the new location in 20 km south west and 2 km to the Tsetseg soum center, and now the villagers seek medical help at the soum hospital.



SOCIAL (CONTINUED)

An important part of Khushuut medical center's function is offering general training for wellness and healthy habits. Annually, our hospital plans and carries training sessions on a number of essential topics attended by several hundreds of mine camp workers and local residents. In 2024, our medical team organized 90 training sessions on various topics such as first aid, cardiopulmonary resuscitation (CPR) technique, general disease prevention and occupational injuries for total of 1,130 MoEnCo's and contractors' workers. Together with the OSH professionals, our medical team participates in work place inspections against health hazards throughout the year. The EmMed LLC recorded and analysed all health related data of Khushuut mine, prepares a comprehensive annual report and presented it to MoEnCo while various mandatory statistical data were presented to the Khovd Health Department. Based on findings and recommendations of the report, further actions were promptly taken, for example, adjustments in the camp canteen menu, in training curriculum topics and duration, choice of vaccines and health supplies at the camp, and so on.

CHEMICALS HANDLING AND COAL QUALITY ASSURANCE

Through its 12 years of operations, MoEnCo's full scale chemical laboratory at the Khushuut mine site has become the largest laboratory in the western region of the country. The first and only nationally certified private chemical laboratory in Khovd province, it now operates 24/7 on the 457 m² premises and with 43 full-time professionals, as of March 2025, who are all locally hired.

In its handling of chemicals, MoEnCo has to comply with the Law of Mongolia on Hazardous Chemical Substances, the national mandatory standard MNS ISO/IEC 17025:2018 (General requirements for competence of a testing and calibration laboratory), and a number of mandatory guidelines and standards. The actions for safe chemicals handling and management are included in MoEnCo's annual Environmental Management Plan and the due performance is reported to the Ministry of Environment and Climate Change every year.

Ever since its set up in 2013, MoEnCo's laboratory has been continuously meeting the minerals quality assurance and safety requirements of the international ISO standards, PRC's GB/T standards and American ASTM standards. The laboratory first received an accreditation by the Standardization Accreditation Office of Mongolia in April 2018 upon proving our long-term continuous satisfaction of the due requirements of the Mongolian National Accreditation System (MNAS). Our team re-assures its professional capacity by successfully participating in the annual proficiency testing contest held by the government-run Central Geological Laboratory under the National Coal Programme. The laboratory also regularly participates in the Proficiency Testing Schemes of the China NIL Research Center for Proficiency Testing and receives a certificate of professional proficiency. The Standardization and Metrology Agency performs inspection and calibration of the laboratory's select equipment annually.

Continuous training of staff is an essential aspect of safety assurance and professional development of our laboratory. Thus, in 2024, the laboratory had 42 staff attending various internal classes and external training organized by the International Standards Academy, Global Strategy Management Institute, Faculty of Chemistry of the Mongolian national University, and other reputable institutions on subjects concerning the standards compliance, safe chemical and electrical handling in a laboratory setting, risks assessment and mitigation, disasters and accident prevention.

It is one of the prime duties of the MoEnCo's laboratory to ensure the chemical compositions of our coal for export meet the applicable standards. In 2024, our laboratory performed 12 different proximate and ultimate analysis and coke activity tests of 162,381 kg of coal and soil samples using more than 80 different testing equipment. Our export coal is required to be tested and sampled at the Chinese border to ensure the imported goods comply with the applicable Chinese laws and requirements, and if these products are falling short of the standards, import will be rejected.

As of March 2025, the laboratory used 18 different non-poisonous chemicals for which we duly obtained and maintained permits for their use, transportation, storage and import from the Ministry of Environment and Climate Change and other relevant government bodies upon satisfying the requirements for use of chemicals in mining operations and of timely reporting. A team of assigned professionals perform monthly inventories of all chemicals in the laboratory's modern and safe storage facility which complies with the MNS 6458:2014 standard (General requirements for storage of toxic and hazardous chemicals and products).

A review of the laboratory's operations is a part of the annual Government environmental assessment of Khushuut mine. In 2023, in addition to receiving a team of the provincial and soum environmental inspectors, our laboratory hosted a group from the Central Customs Laboratory of the General Customs Authority of Mongolia headed by the Director of the Laboratory. During their visit, it has been agreed to work towards making a tripartite cooperation agreement between the Central Customs Laboratory, Bulgan border port (through which MoEnCo exports its coal) and MoEnCo's coal laboratory where such arrangement will create favorable conditions for fast information sharing and allow longer terms of various permits and easier export procedures for MoEnCo. In 2024, this tripartite agreement was signed which allow longer term permits to issue and faster and more efficient customs clearance of our export coal.

SANITARY STANDARDS AT THE CAMP

Continuously meeting of the occupational hygiene requirements is a significant part of the MoEnCo's safety programs and planning. A well-maintained camp has a critical impact on the health and well-being of our employees and their work productivity. MoEnCo devotes much efforts and resources into running an exemplary camp that is safe, pleasant and well suited for living in a remote mountainous location. At the Khushuut camp, mine site and Uyench CBY camp, the sanitary hygiene is ensured by the team consisting of two hygienists and two sanitary assurance supervisors.

The measures to safeguard the well-being of our workers target the recognition, evaluation, control and prevention of hazards from work and living arrangements and are realized through the following channels:

- Team prepares and enforces annual health and sanitary assurance plan as part of the annual Occupational Safety Management Plan, its due realization is reported to the Mineral Resources and Petroleum Authority of Mongolia and to the Khovd province Governor's Office.
- For ensuring a healthy and safe working environment for employees and reducing workplace risks, workplace assessment, inspection, sampling and testing are held daily, bi-weekly, weekly or monthly depending on a specific work place. For example, the temperature, humidity, lighting and noise levels are measured and recorded monthly at every workplace at the camp. Measurements are made with the Vital Environmental Meter EM5 and compared to the parameters of the relevant safety standard requirements.
- Regular training of all MoEnCo and of contractors' workers and specific staff, for example, camp canteen cooks, are carried out under the regular schedules for maintaining the due hygiene at the site. The sanitary procedures at the camp are mandatory part of the internal training program. All food handling staff undergo mandatory health checks and tests every six months as required by Regulation A/145 approved by the Health Minister in 2017.
- Rodent, pests and insect prevention, control and disinfection is an important part of the camp's safety. This work is performed in compliance with the "Regulation on hygiene assurance and infection prevention through extermination and disinfection of house pests, insects and rodents" approved by the General Agency for Specialized Inspection in 2017. MoEnCo hires a licenced company from Khovd and processes the entire territory of the camp and some parts of the mine lands in four sessions (i.e. quarterly) per year.

SOCIAL (CONTINUED)

SUPPLY CHAIN MANAGEMENT

The supply chain management of the Group is organized as a process involving comprehensive planning, implementing and monitoring the everyday operations of the entire cluster of inter-related businesses in the western part of Mongolia and north-west of the PRC. The complexity of the cross-border business model necessitates strong supply chain management and compliance at the national levels in both China and Mongolia. The Group's approach to working with contractors and suppliers is based on the principles of fair competition, continuous improvement and focus on ethical conduct.

MoEnCo's supply chain is made up of two main elements:

- **inbound** supply and procurement of services, materials and products for the Khushuut mine operations, coal transportation and the camp living arrangements;
- **outbound** supply and sales of coal to MoEnCo's domestic and Chinese coal buyers and for our free and discounted coal distribution program.

All contracts and agreements with contractors and suppliers include MoEnCo's compliance provisions. These requirements cover important issues such as anti-bribery, labour standards strictly enforced by the national governments in Mongolia and China, workers' health and safety, environmental preservation and rehabilitation schemes, workers' fair pay and hours of work and rest, and mandatory insurance provisions. We require our contractors and suppliers to subscribe all these mandatory schemes for their workers including the health insurance, unemployment, old age pension, welfare, and industrial accidents insurance.

When selecting our suppliers and contractors, MoEnCo adheres to two main selection criteria:

- priority is given to local, Khovd, companies and individuals interested in working with us; and
- products and services offered by suppliers and contractors should, first of all, satisfy needs and demands of our mine workers and the specifics of MoEnCo's operations in the remote region of Mongolia with harsh climatic and terrestrial conditions.

All contractors and suppliers, new or current, are assessed in accordance with the requirements regarding ethics, corruption, and labour standards risks prior to working with them. Significant support to the local economy comes from MoEnCo's procurement of goods and services. As a responsible corporate citizen, MoEnCo continues to put emphasis on community developments and partnerships by giving back to local citizens. We share the benefits with rural communities and generate economic values by creating jobs and procuring local services and goods. In order to support and strengthen local small and medium sized businesses, local companies in Khovd which meet our procurement requirements are given preference to be our suppliers. In the reporting period, MoEnCo engaged 132 businesses and citizens of Khovd province and purchased services and products worth of MNT418.6 billion (HK\$958,464,990.61) which makes over 90% of all MoEnCo's procurement. This is also over 55% increase compared to the 2022 local procurement data. Through the year of 2024, the calls for suppliers, procurement needs and information for all suppliers have been published on the MoEnCo's website. We created and maintain a database of potential and existing suppliers and contractors, the registration form is available at www.moenco.mn. Intended companies and individuals send their proposals directly to the Procurement Department using this online form, whereupon an account is created for every supplier.

The Group's supply chain management concentrates on cross-border logistics and chain coordination in China and Mongolia and also focuses on competition orientation at global and regional levels. And at the local level, we strive to do business with those companies who share our respect for the environment, law and ethical behavior.

PRODUCT RESPONSIBILITY

The Group sells coking coal, thermal coal and raw coal while coking coal is the main commodity for our target customers in Xinjiang, PRC.

We understand the importance of product quality and customers' satisfaction; hence, we have always adhered to the philosophy of providing customer with products of good coal quality, and meeting the needs and demands of our customers to their satisfaction.

The Group has well established coal quality assurance and control system. We carry out quality management throughout the whole of our business process from production to after-sales.

Our mine team takes the lead role in the production process in compliance with the relevant laws in Mongolia while our coal quality department assures that we have strictly complied with the laws and regulations of the host countries and other applicable laws and regulations and requirements. During the reporting period, it did not come to our knowledge that our products have any health and safety issues or in violation of the relevant applicable laws.

Sampling and testing will be conducted subsequent to the arrival of coking coal in our customer's site. Our coal quality department will take coking coal samples each day and/or every ten vehicles for coal testing including but not limited to G-value, moisture contents, ash level, volatile matters, water testing, Y-value, etc. The unit price will be fluctuated according to the test result but within a range as stipulated in the sales contract. In general, it is not necessary for us to recall. There is a standard procedure to follow in case our coal products are reported with quality defects, variations or dissatisfaction. When this happens, our coal quality department and sales department will immediately communicate with the customer and obtain information in details in relation to the quality issue concerned. Our representative will then collect coal samples on site for laboratory test. Depending on situations and cases, an independent testing institution will be engaged to carry out sampling, analytical and testing tasks. Our coal quality department and the respective sales will base on the internal guidelines to keep following up the issues and keep the management and the respective customers updated until the problems are satisfactorily solved.

As we have stringent quality assurance procedures, from production to after sales, during the Financial Year, none of our coal sold or shipped had been subject to recall for safety and health reasons and no major complaints on our coal quality had been received.

In relation to customers' privacy, we have committed to maintain highest standard of business ethics. We have clear practice instructions in the handling and protection of the sensitive commercial information and information provided by customers in our business transactions. We assure that all commercial contracts are private and confidential. Only the handling officer, related officers and management are permitted to have access to such information. All of these related officers are required to sign the mandatory confidential agreement.

ANTI-CORRUPTION POLICY

The Group upholds a high standard on promoting anti-corruption requiring all its employees and directors to maintain impeccable business ethics. The Group is committed to preventing, detecting and reporting all types of fraud including bribery and corruption.

SOCIAL (CONTINUED)

MEC's Audit Committee has responsibility to review and raise concerns about possible improprieties in financial reporting, internal controls and other matters. No incidents regarding bribery, corruption or unethical behavior were recorded or identified in the Financial Year.

MEC has a whistleblowing policy which is written in its internal regulations. This policy aims to provide a formal channel for our employees and stakeholders to report concerns about any suspected misconduct, malpractice or irregularity. This policy is intended to protect the whistleblower to report its concerns without fear of victimization, subsequent discrimination or disadvantage.

MoEnCo's approach to anti-corruption and ethical business conduct is outlined in its internal regulations which, among other matters, identifies our obligations, as a company, to comply with all applicable laws and to avoid and report bribery and corruption cases.

MoEnCo ensures anti-corruption approach and prevention of nepotism through:

- due diligence of potential employees, contractors and suppliers;
- effective communication channels between the management and all staff including those working at Khushuut camp;
- dedicated assessment of bidders and their tender proposals offering their services to MoEnCo; and
- inclusion of anti-bribery provisions in the employment contracts with all MoEnCo workers and managers.

The Group ensures that all of its operations and interactions are conducted in an ethical, honest, and accountable manner and in accordance with all applicable laws and regulations. With thousands of workers, suppliers and contractors, the Group strives to ensure that not only is corruption contrary to our values and responsibility, it may also erode our ties with the communities where we operate. During the Financial Year, as there were no suitable topics of anti-corruption training programs, no such training was provided or attended by the directors and staff of the Group. We expect all employees to identify and raise concerns about unethical business conduct, including potential bribery or corruption issues. The Group maintain strong anti-retaliation policy for those would raise concerns timely and in good faith.

The Group believes that transparency and reporting is a proper tool to ethical business conduct pursuant to the relevant laws and regulations as well as its own policies. The Group regularly reports its operations, revenues, taxes, environmental performance and social issues through several channels:

- the website of the Group and the HKEX;
- Mineral Resources and Petroleum Authority of Mongolia, Ministry of Environment and Climate Change of Mongolia;
- Khovd province Government;
- MoEnCo's website (<http://moenco.mn>);
- Extractive Industries Transparency Initiative (www.eitimongolia.mn).

COMMUNITY



COMMUNITY (CONTINUED)

INVESTMENT AND CONTRIBUTION TO THE COMMUNITY AND ITS ECONOMY

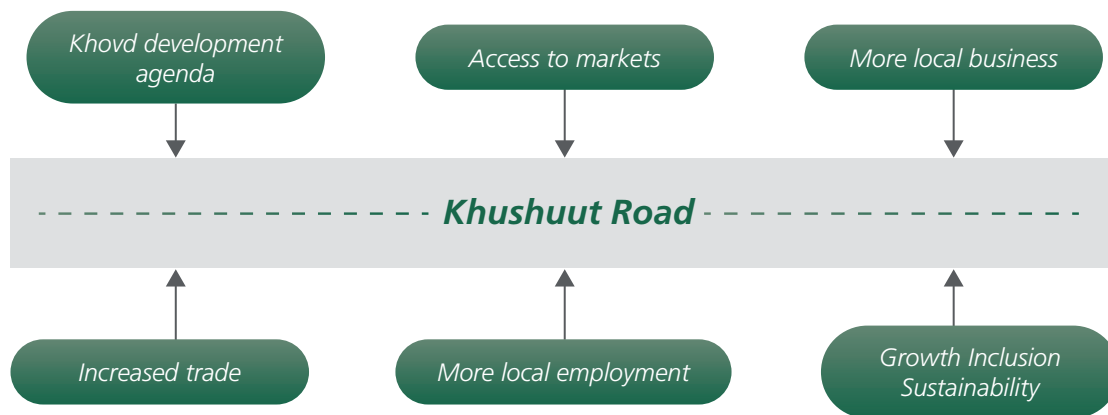
The Company verily believes that education is the foundation of a sustainable and prosperous society. Creating a culture of support for teachers is vital to student success. It is also necessary to create environmental awareness at children education period. During the Financial Year, the Company donated a lump sum of HK\$500,000 to a charitable organisation, with its own missions to deliver high-quality of STEAM education for children in Hong Kong and to nurture a positive and proactive life value, for activities: i) primary teachers' training sessions in acquiring the AI and Science & Technology techniques to be needed in classroom and to manage the latest syllabus changes and ii) the STEAM approach workshop to equip primary children with a foundational understanding of ecology and environmental conservation ideas and guide primary children to integrate science into environmental conservation.

MoEnCo has been listed as one of the "Mongolia's Top-100 Companies" issued by the Mongolian National Chamber of Commerce and Industry since 2017. These nominations were made upon evaluating MoEnCo's outstanding business performance, large number of jobs created in the remote region of the country, and tax payments to the central and provincial budget, among other criteria. We consider these consecutive nominations as a fair assessment of MoEnCo's contribution to the regional economy and well-being of the local people.

MoEnCo invests into the economy and makes contributions to the communities of the region through various channels and at several levels which are described below.

Local infrastructure development

In 2011, MoEnCo commissioned the 311 km long Khushuut road which connects the coal mine to Bulgan border point on the Mongolian side, and Takeshenken border on the PRC side. Over the past 10 years of its operations, Khushuut road has been the only hard-covered road within three neighboring rural districts and the artery through which the local economy pulses. Briefly, Khushuut road's decade long role in the Khovd development agenda can be illustrated as follows:



MoEnCo applies much efforts to maintaining its road to withstand extreme winter and summer temperature fluctuations in Mongolia and heavy freight load. Local residents of entire Khovd province use our asphalted road without any fees or tolls. Our local contractor – road maintenance company carries annual repair works in strict compliance with the requirements of the Roads Law of Mongolia and the national standards. The Khushuut road creates a substantial number of local jobs engaging people in snow, ice, sand removal, natural sludge clearing, asphalt application and repairs, upgrades, replacement of road signs, arranging drivers' rest areas, etc. Over the years of operations, various private companies set up eateries and stores in four locations, and MoEnCo built total of 16 rest areas along the road while petroleum suppliers constructed 10 stations for storing and selling petrol. In December 2024, MoEnCo commissioned 1,066 m long asphalt road connecting Tsetseg soum to Khushuut village with over 700 hundred residents and many of whom are our Khushuut mine workers.

Local employment and investment promotion

Fulfilling our pledge to increase job opportunities for local citizens and support businesses of Khovd, in 2024, MoEnCo recruited over 80% of the total workforce from Khovd province (average of the 12 months of 2024). All our workers, including local ones, enjoy similar benefits, undergo regular full medical checkups and have their social security and health insurance premiums paid by MoEnCo. Moreover, they get on-job training and enjoy the active social life at the camp.

In addition to MoEnCo's own local employees, local jobs are created through:

- the Khushuut road, located in the arid lands in extreme continental climate and used for heavy duty transportation, requires significant maintenance throughout the year (snow, ice, sand removal, natural sludge clearing, repairs, upgrades, replacement of road signs, creating driver's rest areas, etc.), thus, creating a substantial number of local jobs. In 2024, all our maintenance, landscaping and trash removal contractors working along the Khushuut road were local businesses;
- our annual land rehabilitation works, for which we engaged only local residents or professional companies;
- long distance coal transporters by local people;
- all the construction, repairing, landscaping and other types of public works of 2024 financed by the local development funds also provided jobs for many local citizens.

MoEnCo mandatorily includes in its subcontracting agreements with its contractors and suppliers, for example, transportation companies or construction contractors, that they hire the majority of their personnel locally under legitimate labour contracts that meet all legal requirements and with the provisions of compulsory government social and health insurances.

The Group has always maintained an active position in promoting Khovd as a safe investment destination. In addition to creating notable regional procurement, MoEnCo supports the Khovd Government in its investment and trade promotion as means to generate economic development. In 2024, MoEnCo and its three subcontracting companies organized "Open Days" in six soums of Khovd province aimed at introducing the current operations at Khushuut, job vacancies, subcontracting opportunities, procurement procedures, the MoEnCo scholarship and other topics of interest to local residents and businesses.



COMMUNITY (CONTINUED)

Priority to local procurement

Significant support to the local economy comes from MoEnCo's procurement of goods and services. In order to support and strengthen local small and medium sized businesses, local companies in Khovd which meet our procurement requirements are given preference to be our suppliers of drinking water, meat, milk, vegetables and other foodstuffs, construction materials and construction works, vehicles maintenance and rentals, medical drugs and supplies, work uniforms and boots, hotel and meals services, certain equipment rentals, trash, sewage and hazardous waste disposal, cleaning and landscaping, truck drivers training courses, and coal transporting services.

In the past, MoEnCo used to organize information sessions for tender seekers explaining our procurement requirements and procedures. Over the past decade of supplying products and services to the Khushuut mine, the Khovd and other regional suppliers have gained extensive business experience in cooperating with multi-national company like MoEnCo and in cross-border supply. MoEnCo's Procurement Department regularly participates in the "Working Hovd People" day celebrations held in Khovd province where face-to-face meeting and registration of potential local suppliers and subcontractors took place and the information was provided about the procurement procedures and requirements.

MoEnCo's local procurement	2020	2021	2022	2023	2024
No. of contractors and suppliers	252	261	273	283	286
number of local suppliers and contractors (individuals and businesses)	113	103	116	132	135

In 2024, total purchases of goods and services from local businesses and individuals amounted to almost MNT477.8 billion (approximately HK\$1,025,323,991.39). MoEnCo hired only local transportation companies for exporting coal to foreign buyers. For this purpose, we recruited 26 Khovd transportation service providers. MoEnCo hired 132 local businesses and individuals which in turn contracted 285 local suppliers for their products and services for additional MNT 22.6 billion (approximately HK\$51,747,034.85).

MoEnCo's local procurement	2020	2021	2022	2023	2024
Amount of locally purchased goods and services (including coal transportation)	MNT76.1 billion	MNT125.6 billion	MNT270 billion	MNT418.6 billion	MNT477.8 billion
percentage of the total procurement	59%	84%	92%	90.1%	80%

MoEnCo has managed to maintain over 80-90% of local purchases out of total procurement since 2021.

Local cooperation agreements

Performing its obligations of a mining licence holder, MoEnCo entered into three cooperation agreements, of 2014-2016, 2017-2020 and 2021-2024 with Khovd province Government. In the concluding statement papers of the first two Cooperation Agreements, the Khovd province government expressed its "great satisfaction" of MoEnCo's work toward fulfilling its social responsibility.

The 2021-2024 Cooperation Agreement was entered in November 2021, and based on the principles of mutual respect of interests and aims of MoEnCo and of the province Government, non-interference and equal treatment as with any private business operating in the province. In the Agreement, MoEnCo took upon itself a wide range of obligations pertaining to the environmental conservation, creating jobs, supporting local businesses and investing more into the infrastructure. A working group consisting of representatives of the provincial and soum governments and of MoEnCo review the performance of the Cooperation Agreement annually. In December 2024, MoEnCo reported about its commitment to the duties as follows:

- Around 80% of the contractors’ workforce and 90% of MoEnCo’s employees are citizens of Khovd province.
- Annually, 128 households of Tsetseg and Darvi soums residing within 20 km radius of Khushuut mine receive “coal dust compensation” from MoEnCo where selection of these mainly herding families was made by a joint group headed by the Director of Investment and Development Policy Department of Khovd Governor’s Office. In addition to the MoEnCo’s contribution, Khovd province offered the same amount of compensation. All the funding are deposited into a special joint bank account and distributed to the eligible households.
- MoEnCo supplied over 88,600 tonnes of coal of various types for free or at a notably discounted price that is at least eight times lower than the Khovd market price, to more than 13,000 residents, and also gifted coal to elderly people of Khushuut bag and MoEnCo retirees.

By end of December 2024, the term of the above Cooperation Agreement has expired. In January 2025, the Governor of Khovd province established a joint working group to review the performance of the 2021-2024 Cooperation Agreement and stated its very satisfactory conclusion. The joint working group is in the process of preparing an agreement of cooperation between MoEnCo and Khovd province government in the 3-5 years.

Khushuut development funds

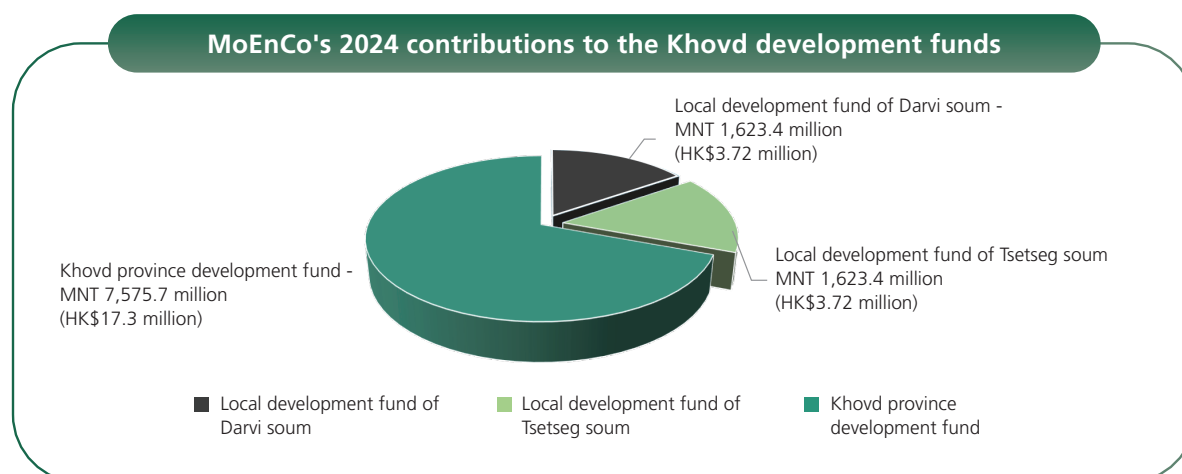
MoEnCo annually contributes cash to the local development funds of the Khovd Government under the Cooperation Agreement. The contributions go to (i) Khovd province development fund (ii) local development fund of Tsetseg soum and (iii) local development fund of Darvi soum. The appropriations of these funds, annual plans and reports are approved by the Khovd province citizen’s Khural (provincial assembly) and by soum Khurals respectively.

In 2024, fulfilling its obligations under the Cooperation Agreement, MoEnCo transferred approximately MNT10.8 billion (approximately HK\$24,728,671.52) to the above funds. This is almost 5-fold increase compared to our contribution in 2021, and 29% increase compared to the 2023 amount.

	2014-2020	2021	2022	2023	2024
MoEnCo’s contribution to the local development funds of Khovd	MNT7,949.63 million (HK\$21.68 million)	MNT2,034.18 million (HK\$5.41 million)	MNT6.7 billion (HK\$17.18 million)	MNT7.7 billion (HK\$17.77 million)	MNT10.8 billion (HK\$24.73 million)



COMMUNITY (CONTINUED)



Donations and in-kind services

In the reporting period, MoEnCo continued its promotion of the local development through donations, free coal distribution and in-kind services.

- In-kind works and services offered free of charge to the local residents include:
 - MoEnCo's health center at the mine site provides free outpatient medical care and emergency services for local people of three nearby soums. In 2024, our medical team treated 58 patients from the local community without charge.
 - MoEnCo's conservation efforts include a component of stewardship of the archeological monuments which are plenty in Khovd. Under the Law of Protection of Cultural Heritage and the Minerals Law, corporate land users are in charge for protecting and maintaining historical monuments located in their leased areas. There are a total of 114 natural and cultural monuments recognized and registered as such on the territories associated with Khushuut mine and road in Darvi and Tsetseg soums. Now we safeguard these distant burials, ruins and monuments through some conservation works, keeping their registry and placing direction signs, safety warnings and information and direction boards. In 2022, we did maintenance at four cultural sites and updated their registry in MoEnCo's database. Aiming to build awareness of protecting historical and cultural heritage and promoting applicable laws, in 2024, we renewed, installed and handed over to Darvi and Uyench soums three information boards erected near the historical sites.
- MoEnCo scholarships: in previous years MoEnCo fully or partially sponsored total of 173 students from Khovd to study at universities and colleges of Mongolia and at the Khovd Vocational Training and Production Center. In 2022, MoEnCo relaunched this program and offered partial scholarships to 15 students of seven soums of Khovd to pursue their bachelor's degrees in the universities. In 2023, another 20 undergraduate students and, in 2024, 19 more students of Khovd received scholarships to study mining and equipment engineering, occupational safety and health, environmental conservation and other applicable subjects. From 2022, some graduates started returning back to their native Khovd province and launched their professional careers at Khushuut. Total number of Khovd students supported by MoEnCo was 227.

- MoEnCo’s donations are in addition to the funds paid to Khovd Development Fund.
 - Our donations are often necessitated by an emergency, either due to weather or medical conditions. For example, MoEnCo regularly donates animal feed to some local herders and families of some of our site workers during harsh winter or drought in the spring as well as for community emergency preparedness. We offer various gifts and free coal vouchers to some local seniors and MoEnCo retirees annually. In 2024, 14 seniors received all-expenses paid vacation at a regional resort.
 - To support sustainable local development, MoEnCo offered financial aid to six small and medium-sized enterprises in 2022-2024 where these recipients have been selected in open bid jointly with the Khovd Governor’s Office. In 2022, support was offered to two tree nursery start-ups in line with the Billion Tree National Movement, while in 2023, such aid was provided to two local food producers within the scope of the Healthy Food – Healthy Mongolians Program, and in 2024, our financial aid reached 2 agricultural companies that qualified the goal of “Introducing modern technologies in agricultural production and improving productivity” of the 2020-2024 Action Programme of the Mongolian Government.
 - MoEnCo gifted a van with enhanced cross-country capacity and some additional vehicle equipment to the Crime Prevention Council of Bulgan soum Police Department in January 2024. It was agreed with this Council that the van would be used for ensuring traffic safety on our 311 km coal transportation road and in its “park-and-rest” areas. MoEnCo will further work with this Council to establish traffic patrol posts along the Khushuut road.
 - We regularly participate in holding various events and celebrations geared at local businesses and communities and host visitors of various backgrounds, from school pupils to politicians. For example, 2022-2024, Khushuut camp hosted over 800 people (members of Mongolian Parliament, elected provincial officials, officers and representatives from central and local government and non-government organizations, local citizens and students) to tour the site, review the mining operations, conduct discussions on specific topics or carry out assessments, provide recommendations, exchange information, and so on.
- Free and discounted coal distribution. MoEnCo distributes free or significantly discounted coal for the local community members and at request of provincial and soum governments to (i) support local business; (ii) help the communities to overcome harsh winters of Mongolia or (iii) other urgent events such as Covid-19 outbreak. Considering exceptionally long and harsh 2023-2024 winter in Mongolia, MoEnCo distributed 2 – 4 tonnes of coal to every household of Khovd depending on the proximity of a soum to Khushuut mine. This initiative was carried out over the period of November 2023 – end of February 2024 through administrations of all 17 soums of Khovd province.

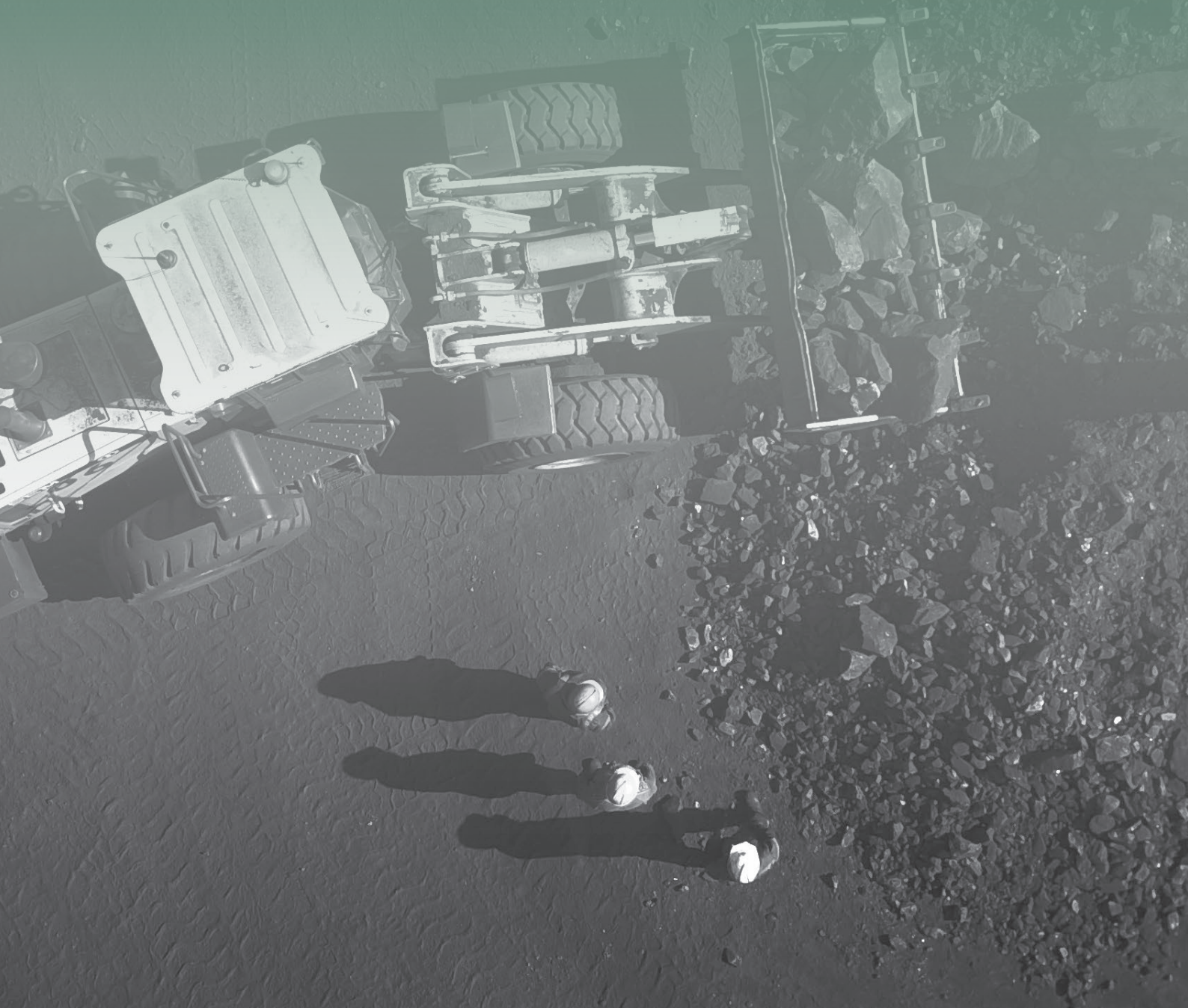
MoEnCo’s 2024 free and discounted coal distribution	2014-2021	2022	2023	2024
Tonnes of coal distributed free of charge	5,643.25	121	30,819	14,320
Tonnes of discounted coal sold	199,461	68,507	80,394	82,197
No. of local households, social organizations or companies which received discounted coal	26,708	11,394	2,559	6,474
No. of recipients of free coal	280	30	14,118	6,911

COMMUNITY (CONTINUED)

MoEnCo's discounted "social coal" distribution



HKEX ESG REPORTING GUIDE INDEX



HKEX ESG REPORTING GUIDE INDEX (CONTINUED)

Subject Areas, Aspects General Disclosures and KPIs	Sections for Disclosure
A. Environmental	
Aspect A1: Emissions	
General Disclosure	<p>Information on:</p> <p>(a) the policies; and</p> <ul style="list-style-type: none"> • Environmental Policy and Management • Environmental Audits • Environmental Performance Reporting • Air Quality Monitoring • Dust Reduction • Vehicle Emissions Control • Integrated Waste and Sewage Management at the Camp • Soil Quality Monitoring • Rehabilitation of Mine Disturbed Areas • Chemicals Handling and Coal Quality Assurance <p>(b) compliance with relevant laws and regulations that have a significant impact on the issuer relating to air and greenhouse gas emissions, discharges into water and land, and generation of hazardous and non-hazardous waste.</p> <ul style="list-style-type: none"> • Environmental Policy and Management • Environmental Audits • Environmental Performance Reporting • Air Quality Monitoring • Vehicle Emissions Control • Integrated Waste and Sewage Management at the Camp • Soil Quality Monitoring • Chemicals Handling and Coal Quality Assurance
KPI A1.1	<p>The types of emissions and respective emissions data.</p> <ul style="list-style-type: none"> • Air Quality Monitoring • Dust Reduction • Environmental Management and Performance at Xinjiang Washing Plant • Environmental Performance Overview
KPI A1.2	<p>Direct (Scope 1) and energy indirect (Scope 2) greenhouse gas emissions (in tonnes) and, where appropriate, intensity (e.g. per unit of production volume, per facility).</p> <ul style="list-style-type: none"> • Air Quality Monitoring • Environmental Management and Performance at Xinjiang Washing Plant • Environmental Performance Overview
KPI A1.3	<p>Total hazardous waste produced (in tonnes) and, where appropriate, intensity (e.g. per unit of production volume, per facility).</p> <ul style="list-style-type: none"> • Integrated Waste and Sewage Management at the Camp • Environmental Management and Performance at Xinjiang Washing Plant • Environmental Performance Overview

Subject Areas, Aspects General Disclosures and KPIs

Sections for Disclosure

KPI A1.4	Total non-hazardous waste produced (in tonnes) and, where appropriate, intensity (e.g. per unit of production volume, per facility).	<ul style="list-style-type: none">• Integrated Waste and Sewage Management at the Camp• Environmental Management and Performance at Xinjiang Washing Plant• Environmental Performance Overview
KPI A1.5	Description of emissions target(s) set and steps taken to achieve them.	<ul style="list-style-type: none">• Air Quality Monitoring• Measures to Reduce GHG Emissions• Dust Reduction• Vehicle Emissions Control• Integrated Waste and Sewage Management at the Camp• Rehabilitation of Mine Disturbed Areas• Corresponding Protection Program• Environmental Management and Performance at Xinjiang Washing Plant
KPI A1.6	Description of how hazardous and non-hazardous wastes are handled, and (a) description of reduction target(s) set and steps taken to achieve them.	<ul style="list-style-type: none">• Water Use Management and Quality Monitoring• Integrated Waste and Sewage Management at the Camp• Soil Quality Monitoring• Environmental Management and Performance at Xinjiang Washing Plant
Aspect A2: Use of Resources		
General Disclosure	Policies on the efficient use of resources, including energy, water and other raw materials.	<ul style="list-style-type: none">• Water Use Management and Quality Monitoring• Environmental Management and Performance at Xinjiang Washing Plant
KPI A2.1	Direct and/or indirect energy consumption by type (e.g. electricity, gas or oil) in total (kWh in '000s) and intensity (e.g. per unit of production volume, per facility).	<ul style="list-style-type: none">• Energy Consumption• Environmental Management and Performance at Xinjiang Washing Plant• Environmental Performance Overview
KPI A2.2	Water consumption in total and intensity (e.g. per unit of production volume, per facility).	<ul style="list-style-type: none">• Water Use Management and Quality Monitoring• Environmental Management and Performance at Xinjiang Washing Plant• Environmental Performance Overview

HKEX ESG REPORTING GUIDE INDEX (CONTINUED)

Subject Areas, Aspects General Disclosures and KPIs		Sections for Disclosure
KPI A2.3	Description of energy use efficiency target(s) set and steps taken to achieve them.	<ul style="list-style-type: none"> • Energy Consumption • Environmental Performance Overview
KPI A2.4	Description of whether there is any issue in sourcing water that is fit for purpose, water efficiency target(s) set and steps taken to achieve them.	<ul style="list-style-type: none"> • Water Use Management and Quality Monitoring • Environmental Management and Performance at Xinjiang Washing Plant
KPI A2.5	Total packaging material used for finished product (in tonnes) and, if applicable, with reference to per unit produced.	N/A
Aspect A3: The Environment and Natural Resources		
General Disclosure	Policies on minimizing the issuer’s significant impacts on the environment and natural resources.	<ul style="list-style-type: none"> • Water Use Management and Quality Monitoring • Soil Quality Monitoring • Rehabilitation of Mine Disturbed Areas • Corresponding Protection Program
KPI A3.1	Description of the significant impacts of activities on the environment and natural resources and the actions taken to manage them.	<ul style="list-style-type: none"> • Water Use Management and Quality Monitoring • Soil Quality Monitoring • Rehabilitation of Mine Disturbed Areas • Corresponding Protection Program
Aspect A4: Climate Change		
General Disclosure	Policies on identification and mitigation of significant climate-related issues which have impacted, and those which may impact, the issuer.	<ul style="list-style-type: none"> • Measures to Reduce GHG Emissions
KPI A4.1	Description of the significant climate-related issues which have impacted, and those which may impact, the issuer, and the actions taken to manage them.	<ul style="list-style-type: none"> • Measures to Reduce GHG Emissions

B. Social

Employment and Labour Practices

Aspect B1: Employment

General Disclosure	Information on: (a) the policies; and (b) compliance with relevant laws and regulations that have a significant impact on the issuer relating to compensation and dismissal, recruitment and promotion, working hours, rest periods, equal opportunity, diversity, anti-discrimination, and other benefits and welfare.	<ul style="list-style-type: none"> • Employment Practice, Welfare and Benefits • Occupational Safety • Employment Practice, Welfare and Benefits • Occupational Safety
KPI B1.1	Total workforce by gender, employment type (for example, full- or part-time), age group and geographical region.	<ul style="list-style-type: none"> • Employment Practice, Welfare and Benefits
KPI B1.2	Employee turnover rate by gender, age group and geographical region.	<ul style="list-style-type: none"> • Employment Practice, Welfare and Benefits

Aspect B2: Health and Safety

General Disclosure	Information on (a) the policies; and (b) compliance with relevant laws and regulations that have a significant impact on the issuer relating to providing a safe working environment and protecting employees from occupational hazards.	<ul style="list-style-type: none"> • Training and Development Program • Occupational Safety • Emergency Response and Readiness • Noise Control and Reduction Measures • Medical Care for Our Workers and the Community • Sanitary Standards at the Camp • Training and Development Program • Occupational Safety • Emergency Response and Readiness • Noise Control and Reduction Measures • Medical Care for Our Workers and the Community • Sanitary Standards at the Camp
KPI B2.1	Number and rate of work-related fatalities occurred in each of the past three years including the reporting year.	<ul style="list-style-type: none"> • Occupational Safety

HKEX ESG REPORTING GUIDE INDEX (CONTINUED)

Subject Areas, Aspects General Disclosures and KPIs		Sections for Disclosure
KPI B2.2	Lost days due to work injury.	<ul style="list-style-type: none"> Occupational Safety
KPI B2.3	Description of occupational health and safety measures adopted, and how they are implemented and monitored.	<ul style="list-style-type: none"> Training and Development Program Occupational Safety Emergency Response and Readiness Noise Control and Reduction Measures Medical Care for Our Workers and the Community Sanitary Standards at the Camp
Aspect B3: Development and Training		
General Disclosure	Policies on improving employees' knowledge and skills for discharging duties at work. Description of training activities.	<ul style="list-style-type: none"> Training and Development Program Sanitary Standards at the Camp
KPI B3.1	The percentage of employees trained by gender and employee category (e.g. senior management, middle management).	<ul style="list-style-type: none"> Training and Development Program
KPI B3.2	The average training hours completed per employee by gender and employee category.	<ul style="list-style-type: none"> Training and Development Program
Aspect B4: Labour Standards		
General Disclosure	Information on: (a) the policies; and (b) compliance with relevant laws and regulations that have a significant impact on the issuer relating to preventing child and forced labour.	<ul style="list-style-type: none"> Employment Practice, Welfare and Benefits Employment Practice, Welfare and Benefits
KPI B4.1	Description of measures to review employment practices to avoid child and forced labour.	<ul style="list-style-type: none"> Employment Practice, Welfare and Benefits
KPI B4.2	Description of steps taken to eliminate such practices when discovered.	<ul style="list-style-type: none"> Employment Practice, Welfare and Benefits

Subject Areas, Aspects General Disclosures and KPIs

Sections for Disclosure

Operating Practices

Aspect B5: Supply Chain Management

General Disclosure	Policies on managing environmental and social risks of the supply chain.	<ul style="list-style-type: none"> • Supply Chain Management
KPI B5.1	Number of suppliers by geographical region.	<ul style="list-style-type: none"> • Investment and Contribution to the Community and Its Economy
KPI B5.2	Description of practices relating to engaging suppliers, number of suppliers where the practices are being implemented, and how they are implemented and monitored.	<ul style="list-style-type: none"> • Supply Chain Management
KPI B5.3	Description of practices used to identify environmental and social risks along the supply chain, and how they are implemented and monitored.	<ul style="list-style-type: none"> • Supply Chain Management
KPI B5.4	Description of practices used to promote environmentally preferable products and services when selecting suppliers, and how they are implemented and monitored.	<ul style="list-style-type: none"> • Supply Chain Management

Aspect B6: Product Responsibility

General Disclosure	<p>Information on:</p> <p>(a) the policies; and</p> <p>(b) compliance with relevant laws and regulations that have a significant impact on the issuer relating to health and safety, advertising, labelling and privacy matters relating to products and services provided and methods of redress.</p>	<ul style="list-style-type: none"> • Product Responsibility • Chemicals Handling and Coal Quality Assurance • Product Responsibility • Chemicals Handling and Coal Quality Assurance
KPI B6.1	Percentage of total products sold or shipped subject to recalls for safety and health reasons.	<ul style="list-style-type: none"> • Product Responsibility



HKEX ESG REPORTING GUIDE INDEX (CONTINUED)

Subject Areas, Aspects General Disclosures and KPIs		Sections for Disclosure
KPI B6.2	Number of products and service related complaints received and how they are dealt with.	<ul style="list-style-type: none"> Product Responsibility
KPI B6.3	Description of practices relating to observing and protecting intellectual property rights.	N/A
KPI B6.4	Description of quality assurance process and recall procedures.	<ul style="list-style-type: none"> Product Responsibility Chemicals Handling and Coal Quality Assurance
KPI B6.5	Description of consumer data protection and privacy policies, and how they are implemented and monitored.	<ul style="list-style-type: none"> Product Responsibility
Aspect B7: Anti-corruption		
General Disclosure	Information on (a) the policies; and (b) compliance with relevant laws and regulations that have a significant impact on the issuer relating to bribery, extortion, fraud and money laundering.	<ul style="list-style-type: none"> Anti-Corruption Policy Anti-Corruption Policy
KPI B7.1	Number of concluded legal cases regarding corrupt practices brought against the issuer or its employees during the reporting period and the outcomes of the cases.	<ul style="list-style-type: none"> Anti-Corruption Policy
KPI B7.2	Description of preventive measures and whistle-blowing procedures, and how they are implemented and monitored.	<ul style="list-style-type: none"> Anti-Corruption Policy
KPI B7.3	Description of anti-corruption training provided to directors and staff.	<ul style="list-style-type: none"> Anti-Corruption Policy

Subject Areas, Aspects General Disclosures and KPIs

Sections for Disclosure

Community

Aspect B8: Community Investment

General Disclosure	Policies on community engagement to understand the needs of the communities where the issuer operates and to ensure its activities take into consideration the communities' interests.	<ul style="list-style-type: none">• Corresponding Protection Program• Emergency Response and Readiness• Medical Care for Our Workers and the Community• Investment and Contribution to the Community and Its Economy
KPI B8.1	Focus areas of contribution (e.g. education, environmental concerns, labour needs, health, culture, sport).	<ul style="list-style-type: none">• Corresponding Protection Program• Emergency Response and Readiness• Medical Care for Our Workers and the Community• Investment and Contribution to the Community and Its Economy
KPI B8.2	Resources contributed (e.g. money or time) to the focus area.	<ul style="list-style-type: none">• Corresponding Protection Program• Emergency Response and Readiness• Medical Care for Our Workers and the Community• Investment and Contribution to the Community and Its Economy

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