

"ZANGEZUR COPPER MOLYBDENUM COMBINE" **ANTI-CORRUPTION POLICY**

In operating its businesses, "Zangezur Copper Molybdenum Combine" CJSC (hereafter referred to as the "Company" or "ZCMC") is committed to ensuring its operations comply with applicable RA laws and relevant international standards and best practice. As a part of this commitment, all the Company's employees (including senior management and members of the Board of Directors) are required to uphold these legal standards, demonstrating honesty and integrity in all business dealings. An important element of this commitment is ZCMC's zero- tolerance policy towards corruption.

Corruption contradicts the core values of the Company, which include professionalism, fairness, sustainability, and adherence to the highest applicable legal and ethical standards as outlined in the ZCMC Code of Conduct. Moreover, even the slightest suspicion of corruption can damage public perception and the Company's reputation.

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In the scope of this Policy the Company:

- ▶ encourages the Company's employees and business partners to speak up about any corruption-related concerns, conduct or practices.
- ▶ continues to actively support the implementation of the Extractive Industry Transparency Initiative (EITI) in the Republic of Armenia.
- ▶ when establishing contractual relations with business partners, ensures they are informed about the Company's Code of Conduct, this Policy, and Anti-Corruption Regulation, and that they commit to comply with them.
- ▶ provides training to all employees on this Policy, the Anti-Corruption Regulation adopted within its framework, and their respective rights and obligations in accordance with them.
- ▶ adopts a detailed Anti-Corruption Regulation, which will outline the prohibition against corruption (including such forms as bribes, kick-backs, facilitation payments, quid pro quo arrangements, clientelism, nepotism, favoritism, sponsorship, revolving doors and excessive or inappropriate gifts and hospitality), obligations arising from it, and restrictions relating to gifts and hospitality, and communicates it to all of its employees and business partners.