ZANGEZUR
PRESERVING
VALUES

Version 1.1
Approved by the Board of Directors
19.10.2026



"ZANGEZUR COPPER MOLYBDENUM COMBINE" CJSC

GRIEVANCE POLICY

In operating its businesses, "Zangezur Copper Molybdenum Combine" CJSC (hereinafter referred to as the "Company" or "ZCMC") is committed to developing mutually beneficial relationships with all stakeholders, especially those communities affected by the Company's operations. However, Company acknowledges that there may be occasions when our activities can raise concerns among residents of local communities and other affected stakeholders which may result in grievances (complaints) regarding the Company's actions. This Policy sets out our approach to such grievances and is applicable to all activities undertaken by ZCMC. The Company is committed to reviewing all complaints in a timely, consistent, and structured manner.

This Policy applies to the Board of Directors, the entire workforce of ZCMC, including senior executives, and contractors, business partners, guests, and visitors to the extent applicable.

Grievances may include, without limitation:

- issues relating to stakeholder engagement or consultations,
- impacts on land rights or access to or use of land and water resources,
- limited opportunities for employment, training, supply, or community development,
- environmental concerns,
- questions about adverse effects on lifestyle and living amenities,
- adverse impacts on jobs and other sources of income,
- questionable behavior of employees, contractors, and business partners,
- human rights issues, and
- previously submitted grievances that have not been adequately addressed.

In the scope of this Policy the Company:

- ensures that the Company's activities comply with the legislation of the Republic of Armenia and applicable international laws, as well as with best international practices, which includes, among others, implementation of the International Finance Corporation (IFC) Performance Standards and the principles of International Council on Mining and Metals (ICMM).
- manages grivances in an accessible, predictable, fair and transparent manner based on interaction and dialogue.
- treats grievances as confidential unless, for instance, the grievance has been made public, a public response is requested, confidentiality is expressly waived by the applicant, or disclosure is required for the purpose of transparency and accountability.
- conducts thorough investigations of grievances received to identify root causes and implement corrective actions to prevent future occurrences, ensuring that the outcomes are shared with stakeholders.
- widely publicizes this Policy and our Grievance mechanism, as well as ensures their availability to all stakeholders who may be affected by the Company's operations.
- provides training to all employees of the Company about this Policy.
- monitors the effectiveness of grievance management and regularly reports it to all our stakeholders.
- provides the necessary resources to implement this Policy.
- regularly reviews and updates the objectives and tasks related to handling grievances, based on performance data and stakeholder feedback.
- critically assesses, through regular reviews and audits, the outcomes of implementing this Policy and identifies areas for improvement.

In addition to this Policy, the Company has established a Grievance Mechanism, which regulates the procedures for submitting complaints and the stages of reviewing these complaints.

Author and project manager:
Artyom Petrosyan

Author:
Armen Stepanyan

Tel. : +374-60-500003, +374-285-33131
E-mail : info@zcmc.am

1 It is crucial to recognize that valid Grievances can also relate to issues beyond those listed, and the presented list should be viewed as illustrative rather than exhaustive.