

"ZANGEZUR COPPER MOLYBDENUM COMBINE"

ENVIRONMENTAL POLICY

In operating its businesses, "Zangezur Copper Molybdenum Combine" CJSC (hereinafter referred to as the "Company" or "ZCMC") is committed to responsible mining that minimizes the negative impact of our activities on the natural environment by employing sustainable environmental practices across all areas of our business. All the Company's stakeholders, including employees, local communities, shareholders and contractors, have a right to expect the Company to take a responsible and sustainable approach to its activities.

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.

In the scope of this Policy the Company:

- ▶ champions environmental stewardship and sustainable practices throughout the Company's operations, fostering a culture of responsibility and innovation in environmental management
- ▶ adheres to the regulations of the the Republic of Armenia and applicable international environmental standards and strives to apply the best global practices in environmental sustainability with the aim of exceeding the standard requirements for pollution prevention, resource conservation, and biodiversity protection, including ISO 14000 standards, the International Finance Corporation (IFC) Performance Standards, the Global Industry Standard on Tailings Management, the UN Global Compact Principles, International Council on Mining and Metals (ICMM) Mining Principles, and the UN Sustainable Development Goals.
- ▶ identifies, evaluates and manages environmental hazards through a robust risk assessment process.
- ▶ continuously improves the Company's environmental management systems to ensure that environmental processes are integrated into all business units within the organisation.
- ▶ develops a strong culture of environmental responsibility among all employees and relevant stakeholders, encouraging active participation in the Company's environmental initiatives and fostering collective commitment to sustainable development.
- ▶ provides comprehensive environmental training and education to empower our employees and relevant contractors, equipping them with the knowledge and tools to effectively contribute to achieving the Company's environmental objectives.
- ▶ provides the necessary resources to implement this Policy.
- ▶ communicates this Policy to all stakeholders who might be affected by the Company's operations.
- ▶ engages in a transparent and proactive manner with all relevant stakeholders regarding environmental performance across all areas of the Company's activities.
- ▶ maintains a high degree of emergency preparedness to effectively respond and recover the consequences from environmental incidents.
- ▶ conducts thorough investigations of environmental incidents to identify root causes and implement corrective actions to prevent future occurrences.
- ▶ continuously strengthens channels for stakeholder feedback and participation, values diverse perspectives in the Company's environmental decision-making processes, and fosters collaborative solutions.
- ▶ monitors the Company's environmental performance and reports regularly to all stakeholders.
- ▶ adopts a proactive approach to integrating new technologies and practices in areas such as energy efficiency, waste reduction, water and biodiversity conservation.
- ▶ regularly reviews and updates environmental objectives and targets 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.

Project manager:
Artyom Petrosyan

Author:
Armen Stepanyan