ZCMC
ZANGEZUR
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VALUES

“ZANGEZUR COPPER MOLYBDENUM COMBINE” CJSC



POLICY AGAINST WORKPLACE VIOLENCE HARASSMENT, DISCRIMINATION & RETALIATION

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PURPOSE

The purpose of this policy is to outline the primary approaches and principles of "Zangezur Copper Molybdenum Combine" CJSC (hereafter referred to as the "Company" or "ZCMC") in addressing workplace violence, harassment, including sexual harassment, discrimination and retaliation. This policy aligns with the Company's overarching objective to establish a safe and secure environment for all individuals within the organization.



POLICY

General

ZCMC has strictly prohibits all forms of workplace violence, including threats thereof, harassment, including sexual harassment, discrimination and retaliation.

DEFINITIONS

Violence is understood to include:

- Physical violence, including fighting and any other harmful physical contact;
- Conduct that threatens, intimidates, or coerces any other person;
- Insults, name-calling, obscene language, and other abusive behavior;
- Intimidation through direct or veiled verbal threats; and/or
- Any acts similar in nature to the above.

Discrimination is any distinction, exclusion or restriction because of sex, race, skin color, ethnic, subethnic or social origin, genetic characteristics, language, religion, worldview, political or other views, belonging to a national minority, property situation, birth, disability, age or any other circumstances of a personal or social nature, the purpose or result of which is a less favorable treatment within the scope of or in relation to employment relations, unless such differentiation, exclusion or limitation is objectively justified by a lawful objective, and the means used to achieve that objective are proportionate and necessary.

Employees who have questions about workplace violence, discrimination, harassment, or retaliation should contact the Sustainable Development Director, who will coordinate the discussion and further actions with the Human Resources Directorate and relevant departments as necessary.

Harassment is a verbal or physical act (or a series of acts) aimed at humiliating, intimidating, displaying aggressive hostility towards an individual, or similar aggressive acts towards an individual. Examples of harassment include, but are not limited to:

- Racial or ethnic slurs, epithets;
- Insults and ridicule;
- Humiliating or intimidating jokes or remarks;
- Inappropriate verbal, graphic, or physical conduct;
- Sending or posting harassing messages, videos or messages via text, instant messaging, or social media.

Sexual harassment is an act or a series of acts of a sexual nature, verbal or physical, which involve pressuring an employee into any sexual activity, or are humiliating, intimidating, hostile, or are otherwise offensive to the individual to whom they are directed. Examples of sexual harassment include but are not limited to non-consensual acts of a sexual nature, offering benefits in exchange for acts of a sexual nature, physical contact and advances of a sexual nature, sexually toned remarks, displaying explicit videos or images on a screen, sexual demands by words or actions, sexually explicit emails or messages.

While romantic relations between employees are not prohibited, employees should ensure any romantic gesture or overture toward one another is respectful and free of coercion. Moreover, employees should avoid public displays of affection in the workplace.

Prohibition Against Retaliation

Prohibition Against Retaliation: ZCMC is committed to prohibiting retaliation against individuals, or their family members, who report, oppose, or participate in an investigation of alleged workplace violence, unlawful harassment (including sexual harassment), discrimination, or other workplace misconduct.

ZCMC's policy against workplace violence, harassment, discrimination, and retaliation applies to all employees and paid/unpaid interns. ZCMC prohibits employees from harassing co-workers, customers, vendors, suppliers, independent contractors, and others doing business with ZCMC or discriminating or retaliating against them. Any such harassment, discrimination, and retaliation will constitute grounds for disciplinary action. ZCMC also prohibits its business partners, vendors, suppliers, independent contractors, and others doing business with ZCMC from harassing employees of ZCMC or discriminating or retaliating against them, and appropriate remedies will be applied if any such harassment occurs.

- If an employee reasonably believes that they are being or have been subject to workplace violence, harassment (including sexual harassment), discrimination, or retaliation in violation of this Policy by another employee or a third-party doing business with ZCMC,
- If an employee witnesses workplace violence, harassment, discrimination, or retaliation by or against another employee or any individual protected by this Policy,
- Managers who receive any complaint of workplace violence, harassment, discrimination or retaliation

they SHOULD immediately contact the Sustainable Development Director via whistleblower@zcmc.am or codeofconduct@zcmc.am.

ZCMC takes all complaints of workplace violence, harassment (including sexual harassment), discrimination, and retaliation very seriously. No employee will suffer retaliation, intimidation, or harassment for reporting incidents or cooperating with an investigation under this policy.

The Sustainable Development Director shall, when necessary, with the support of the Human Resources Directorate, Legal, and Security Departments, conduct investigations into all complaints of workplace violence, harassment, discrimination, or retaliation. In cases where an internal investigation is deemed inappropriate due to potential conflicts of interest or concerns about impartiality, there may be engaged an impartial and qualified external expert to carry out the investigation and present conclusions and recommendations on appropriate actions.

All complaints of harassment, discrimination, or retaliation reported to the Company will be treated with due account to the sensitivity of the matter (including, as much as feasible, ensuring confidentiality), taking into account the need for ZCMC to conduct a thorough investigation.

If the employee (or another person working with ZCMC) wishes to report any violation of this Policy anonymously and confidentially, they can do so according to the Whistleblower Policy.

Violation of this policy will result in disciplinary action. Moreover, supervisors or managers who condone or ignore potential violations of this policy by their subordinates will also be subject to disciplinary actions.

SCOPE OF THE POLICY

This policy applies to the entire workforce of ZCMC, including senior executives. This policy also applies to business partners, vendors, suppliers, independent contractors, and others conducting business with ZCMC, provided that they operate on ZCMC premises or interact with ZCMC employees.

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