

"ZANGEZUR COPPER MOLYBDENUM COMBINE" CJSC

GRIEVANCE MECHANISM



WRITTEN
SUBMISSIONS



grievance@zcmc.am
EMAIL



GRIEVANCE
BOXES



+374-95-364587
HOTLINE



SOCIAL
MEDIA



WWW.ZCMC.AM
THE COMPANY WEBSITE



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Receipt of grievance

1.1 All complaints, concerns, or suggestions addressed to the Company may be received through multiple channels, including written submissions, email (grievance@zcmc.am), hotline (+374-95-364587), grievance boxes, social media ([Facebook](#), [Instagram](#), [Linkedin](#)), the Company website (<https://www.zcmc.am/>).

1.2 A Grievance Coordinator (hereinafter referred to as the Coordinator) is appointed by the respective order of General Director. The Grievance Coordinator receives all complaints, ensures internal registration, classification of each complaint received (according to the relevant areas and stakeholders) and preparation for further review.

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Registration of grievance

2.1 Upon receipt of the complaint, the Coordinator reviews it to determine whether it qualifies as a grievance. Where the complaint qualifies as a grievance, it is recorded in the Grievance Register (see Appendix 1) including date, complainant information, location, category, grievance topic, description of the issue, status, etc. Anonymous grievances are registered in the Company's Grievance Register without indicating any data that would allow identification of the complainant, and with appropriate codes, ensuring the confidentiality of the information provided.

2.2 Within 5 working days, the Coordinator confirms that the Company has received the complaint. The Coordinator ensures periodic updating of the data in the Register, including interim measures and the status of the grievance (in process, pending, closed).

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Categorization

3.1 The Coordinator classifies complaints into groups according to the relevant areas and stakeholders. Based on this classification, grievance is directed to the relevant department for further processing or for additional information, in case the grievance requires investigation.





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Investigation

4.1 The relevant business unit initiates the investigation process ensuring the involvement of responsible people with the necessary competence. Where appropriate, internal and external consultants and specialists may be engaged to support the investigation. Responsibles directly involved in the investigation shall promptly disclose any actual or potential conflict of interest.

4.2 The head of each business unit is responsible for ensuring the appropriate investigation of any complaint addressed to that unit. Where the head of the business unit or any other person involved in the investigation has an actual or potential conflict of interest, the matter shall be referred to the Deputy General Director/Sustainability Director, who shall consider the circumstances and determine the further steps and appropriate process for conducting the investigation.

4.3 The investigation usually begins on the date of grievance registration and ends within 15 working days. If there is insufficient information available and/or the complainant cannot be contacted, the investigation period may be extended. Any extension of the review period shall be duly documented, and, where practicable, the complainant shall be informed of the extended timeframe for handling the complaint.

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Involvement of relevant departments

5.1 Depending on the classification and subject of the grievance, all competent departments of the Company may be involved in order to ensure proper investigation.

5.2 Each department, depending on the area of investigation, must involve a responsible person who provides data, recommendations for resolving the issues raised in the grievance.

5.3 Responsible departments are required to provide the necessary information, conclusions within three working days. The Coordinator monitors the investigation process and the process of timely response to the applicant.

5.4 If necessary, internal legal acts may be adopted to clarify additional responsibilities and deadlines.





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Outcome and response

6.1 After completing the investigation, the business unit initiates corrective actions, which are being agreed with the General Director, if required.

6.2 The Coordinator updates the Grievance Register with the final status and indicates the results of investigation. A formal response is then provided to the complainant on the results of investigation and decisions made within 5 working days, using the contact details provided upon receipt of grievance.

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Investigation of grievances by Compliance Committee

7.1 Depending on the circumstances of the grievance, the Deputy General Director/ Sustainable Development Director may decide to have the grievance reviewed by the Compliance Committee in order to ensure the Company's commitment to maintaining a safe, ethical, and legally compliant work environment, and to oversee the investigation and resolution of issues regarding workplace violence, harassment (including sexual harassment), discrimination, and corruption, as well as violations reported under the Code of Conduct, and - where necessary - the Whistleblowing Policy and the Grievance Policy.

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Reporting

8.1 The Sustainable Development Directorate prepares and submits quarterly reports to the Board of Directors and General Director. These reports include an overview of grievances received, key trends, actions taken, and timeliness of responses.





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Communication and training

9.1 The Sustainable Development Directorate ensures that stakeholders - communities, employees, contractors, and suppliers, are informed about the Grievance mechanism and how to access it. This is done through Company website, meetings, and informational materials. Regular training and awareness sessions are conducted for relevant staff to strengthen effective grievance handling.

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Review and improvement of the process

10.1 The Sustainable Development Directorate conducts periodic reviews of the Grievance Mechanism to ensure it remains effective, up to date, and accessible. The assessment is based on key performance indicators such as accessibility, clarity, timeliness, confidentiality, and alignment with best practices.

10.2 The Mechanism is updated as needed to address gaps and improve overall efficiency of grievance management.

