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VALUES

'24

Confident look into the future

Sustainability Report / 2024

Zangezur Copper Molybdenum Combine CJSC

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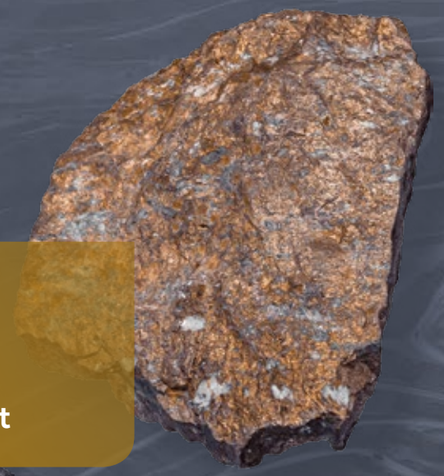
At a glance 2024

Revenue
$713.1 million



The production volume of copper concentrate
181,919 wmt

The production volume of molybdenum concentrate
18,014 wmt

Number of employees at the end of 2024
4,654

Female employees
1,037

Male employees
3,617

Workers from local communities
4,130

Newly hired employees
216

Employee turnover rate
4.89%

Employees are members of the Trade Union
99%

On average, each employee received hours of training
0.47

Total GHG emission
1,258,490 metric tons of CO_2 eq.

Scope 1 GHG emissions
82,370

Scope 2 GHG emissions
229,555

Scope 3 GHG emissions
946,566

Total energy consumption
3,125,321 GJ

Total CO_2 absorbed
767.56 kg

Total volume of water withdrawn
50,650 megalitres

Area restored
21.6 hectares

Total volume of water discharge
39,318 megalitres

Investments in local communities
$18.3 million

Total waste generated
36,943,886 metric tons

Statement from the General Director

I am proud to present our 2024 Sustainability Report.

It is a further source of pride that we remain one of the few companies in Armenia to advance our sustainability reporting efforts consistently. Each year, we strengthen our accountability frameworks — not as a mere checkbox exercise, but as part of a more profound commitment to align with industry best practices and benchmark ourselves against global leaders.

GRI 2-22

Roman Khudoly

General Director

One of our most significant achievements in 2024 was in the area of governance. We adopted and publicly disclosed several key policies, including our Code of Conduct. These policies, ranging from Anti-Corruption and Anti-Discrimination to Environmental and Social policies, represent a vital step toward ensuring that our governance standards protect the interests of all stakeholders. Importantly, these policies were approved at the Board of Directors level, reflecting a strong, top-level commitment to building a robust governance culture. This is just the beginning, and we are determined to continue raising the bar, aiming to make ZCMC a governance leader not only in Armenia but across the region.

2024 also marked the fourth consecutive year in which ZCMC was the largest taxpayer in the country. While this may not be a conventional sustainability milestone, it is a powerful indicator of our commitment to sound governance, financial transparency, and accountability. Being the top taxpayer is a responsibility that extends beyond economic contribution; it also obliges us to operate in a socially responsible and environmentally conscious manner every single day.

ZCMC continues to play an increasingly vital role in the life of Syunik Marz and our surrounding communities. For us, the social component of ESG begins with creating shared values, ensuring that ZCMC's success is inherently tied to the success of our communities. We work hand in hand with local stakeholders to give real, tangible meaning to this principle, fostering collaboration that strengthens both the community and our Company.

2024 was also a year of significant progress in modernizing our environmental management systems –from introducing new safety tools for our tailings management system to designing an advanced water recycling system set to launch in 2025.

For us, sustainability is not a means to an end; it is a business model, one that drives greater efficiency, promotes management excellence, strengthens the Company, and builds lasting stakeholder partnerships. These principles are not just aspirations; they are backed by concrete actions on the ground back them.

ZCMC has a legacy spanning over 70 years. Over the last four years, since we assumed management, we have faced numerous challenges. Change does not happen overnight, but it is the direction we take that determines where we arrive. I am proud to say that we are firmly on the right path.

Statement from the Sustainable Development Director

GRI 2-22

Armen Stepanyan

Sustainable Development Director

Dear reader,

As the Sustainable Development Director at ZCMC, I am proud to present our fourth consecutive Sustainability Report, covering the reporting year of 2024. This report reflects both our achievements and shortcomings on the path toward meeting our ambitious sustainability targets. Like any year on this challenging journey, 2024 brought moments of both pride and disappointment.

The year was overshadowed by a tragic, fatal incident in which one of our employees lost his life in a warehouse accident involving a loader. As with any such tragedy, heartbreak is deepened by the knowledge that it could have been prevented simply by following established safety protocols, in this case, wearing a seatbelt. This underscores the urgent need to embed a strong safety culture into our everyday operations, a key focus area for us in the years ahead.

We also face a significant journey in addressing our carbon footprint. As our data collection processes have improved, we observed a notable rise in reported emissions. While much of this increase stems from improved data accuracy, it also underscores the need for more robust targets and decisive actions in our response to climate change.

At the same time, there is much to be proud of. We remain one of the few companies in Armenia to consistently publish a report following with GRI requirements. Encouragingly, we see this trend gaining momentum in the country, and we are pleased to witness more companies joining us in this important endeavor. We remain committed to leading by example as we expand our reporting frameworks to include compliance with both SASB and IFRS standards. In light of Armenia hosting COP17 on biodiversity next year, we have also begun our journey with the Taskforce on Nature-related Financial Disclosures (TNFD).

Fittingly, the cover of this year's report features the brown bear — a proud symbol of one of our local communities and a reflection of our growing focus on biodiversity.

We have also updated and disclosed most of our essential corporate policies. I can confidently state that these reflect the highest standards of corporate governance. While we still have work to do in aligning our governance structure with leading industry standards, adopting these policies at the Board level marks a significant step toward full compliance. It demonstrates the Company's firm commitment to this goal.

This report offers additional highlights that, I believe, make it a detailed, comprehensive, and honest account of our sustainability journey.

Finally, I would like to express my sincere gratitude to the dedicated and competent professionals in the sustainability team at ZCMC, whose work makes this progress possible, as well as to the champions in other teams across the Company who support this endeavor. I also extend my thanks to the management and Board of the Company for their unwavering support and for sharing our belief that sustainability is not just a value but a strategic business objective and a cornerstone of long-term success.

Who We Are: "Zangezur Copper Molybdenum Combine" CJSC

14 — Engagement: Demonstrating a Strong Commitment to the Industry
16 — Business Model and Value Chain
18 — Supply Chain Responsibility

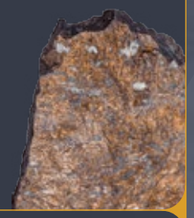
GRI 2-1

"Zangezur Copper Molybdenum Combine" CJSC (hereinafter "ZCMC" or "the Company") is a leading mining enterprise located in the city of Kajaran, Syunik Marz in the south of the Republic of Armenia. The Company operates the largest open-pit mine in the area, specializing in the extraction and processing of copper and molybdenum. ZCMC ranks among the world's top twenty molybdenum producers.

Ore reserves in the Kajaran ore basin, in million metric tons

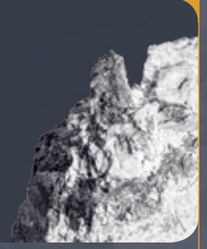
Copper

5.763



Molybdenum

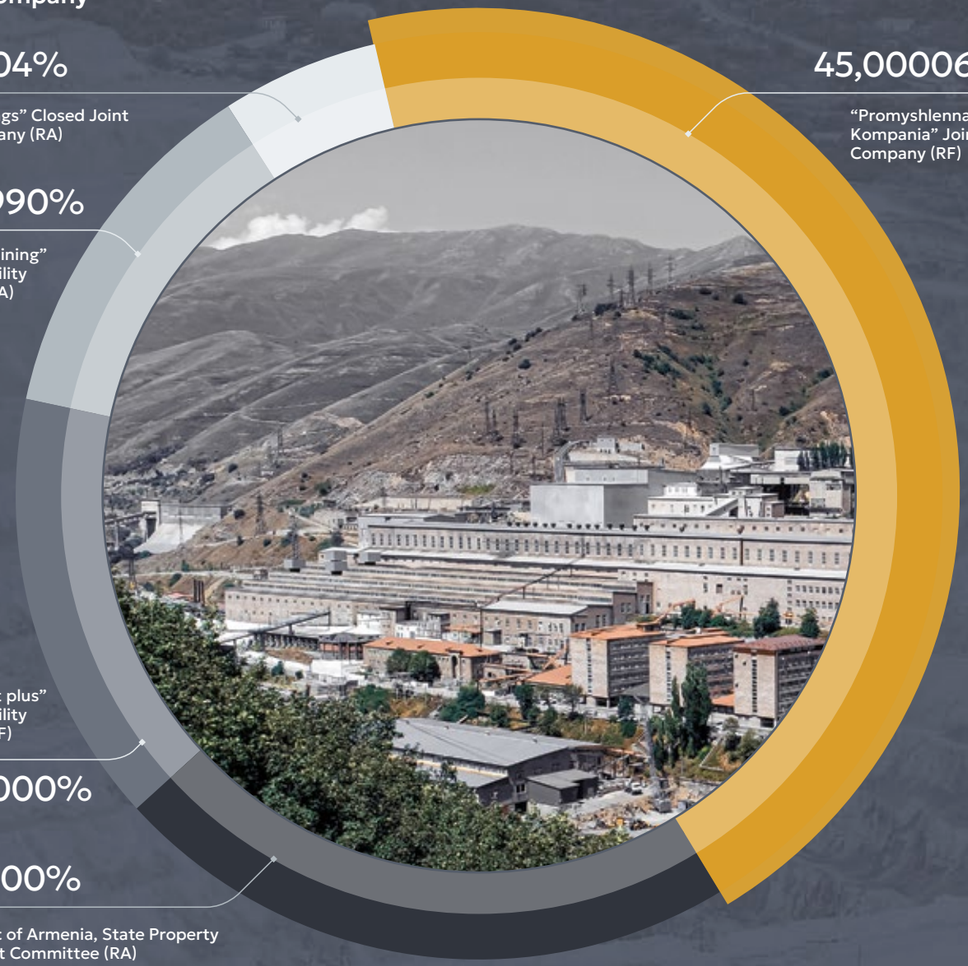
0.815



The Kajaran mine is situated on one of the spurs of the Zangezur ridge, in the Voghji River valley. The terrain is rugged, with elevations ranging from 1,800 to 3,900 meters. The pit itself is located 1.7 to 2.5 kilometers southwest of Kajaran, at an altitude of approximately 2,200 meters above sea level.

The area around the site has high elevations, with mountains reaching elevations of approximately 4,000 meters near the open pit. The processing plant is situated conveniently near the Kajaran mine, roughly 27 kilometers straight-line distance from the Artsvanik Tailings Storage Facility.

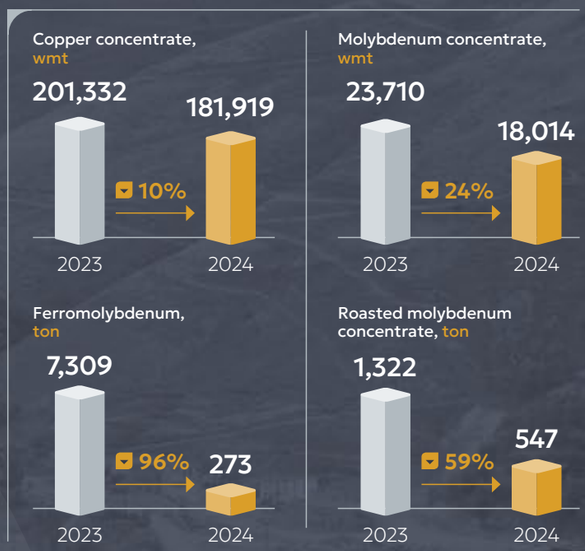
Share Distribution Among Stakeholders of the Company



- 5,62504% — "AMP Holdings" Closed Joint Stock Company (RA)
- 12,49990% — "Zangezur Mining" Limited Liability Company (RA)
- 45,000062% — "Promyshlennaya Kompania" Joint Stock Company (RF)
- 15,00000% — "Urbanevent plus" Limited Liability Company (RF)
- 21,87500% — The Republic of Armenia, State Property Management Committee (RA)

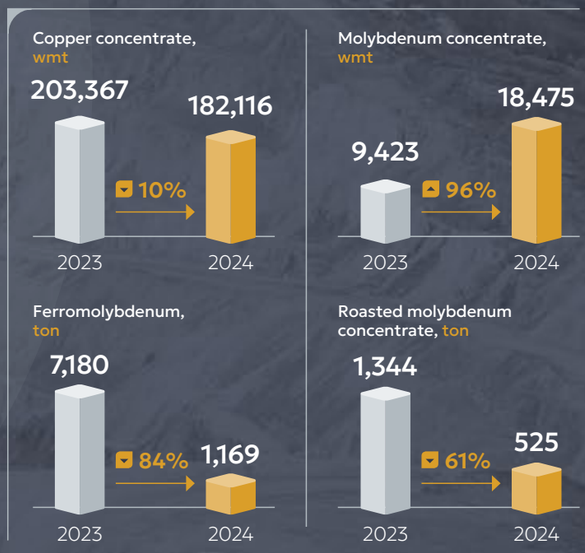
In 2024, the production volume of copper concentrate reached 181,919 wmt, while that of molybdenum concentrate totaled 18,014 wmt. Combined, the total production volume of copper and molybdenum concentrates declined by approximately 11% compared to 2023. The primary reason for the decrease in production was the lower grade of the ore, which resulted in reduced metal output.

Amount of production per concentrate type



As a result of the decline in production volumes, a corresponding decrease in sales volumes was also observed in 2024, amounting to approximately 6%.

The sales volumes per concentrate type



Engagement: Demonstrating a Strong Commitment to the Industry

GRI 2-28

17 PARTNERSHIPS FOR THE GOALS

ZCMC is committed to advancing the dialogue around the mining industry both within Armenia and globally, actively promoting a more sustainable and responsible future for the sector. Our involvement with leading industry associations and advocacy groups demonstrates our ongoing dedication to ethical conduct, transparency, and long-term sustainability.

Through these partnerships, we strive to promote practical solutions, foster knowledge sharing, and advocate for responsible mining practices. We also utilize these platforms to engage in constructive dialogue with a diverse range of stakeholders, addressing key issues related to environmental stewardship, social responsibility, and corporate governance. By raising our voice in these important discussions, we aim to help shape policies and practices that support the ongoing development of a resilient and sustainable mining industry.

Union of Miners and Metallurgists of Armenia (UMMA)

As a pivotal industry association, UMMA (In 2025 renamed as Mining and Metallurgy Association of Armenia Public Organization) provides a platform for influencing industry policies and addressing critical issues affecting the mining sector. Throughout the reporting year, ZCMC continued to spearhead essential industry discussions within UMMA, with our First Deputy General Director, Vardan Jhanyan, serving as the elected chairman. Numerous meetings, seminars, and workshops were organized to facilitate dialogue between the industry and various stakeholder groups. Notably, a series of workshops for journalists, organized in collaboration with the Economic Journalists' Club, enabled in-depth, off-the-record conversations with industry executives on challenging topics.

ZCMC is actively engaged in meetings with key ministries of the RA Government to promote policy and legislative improvements related to the industry. In September 2024, UMMA, with ZCMC as the primary sponsor, organized the first-ever "Mining Armenia Forum". This two-day international event brought together UMMA members, government officials, including the Minister of MTDA, civil society representatives, and academics for in-depth industry discussions. The forum's success, supported by partners such as Lydian Armenia, BDO Armenia, and Grant Thornton Armenia, has laid the groundwork for it to become an annual event.

Extractive Industries Transparency Initiative (EITI)

Our dedication to the EITI principles and standards remains firm. In March 2024, the first meeting of the EITI Multi-Stakeholder Group took place, where key decisions were made regarding Armenia's fifth national EITI report for 2022, which has been delayed due to several technical issues. ZCMC not only provided crucial data but also actively helped in selecting the contractor for the report preparation.

In July 2024, a special mission in Yerevan included a joint delegation from the EITI International Secretariat and "Open Ownership". ZCMC played a significant role in MSG meetings, contributing to industry perspectives and addressing stakeholder concerns, thereby aligning with the EITI's mission and spirit. We are proud that the EITI Board recognized Armenia's overall score (89.5 points) as high in EITI implementation in 2024, a testament to our collaborative efforts with other stakeholders.

Broader Business Community Engagement

ZCMC remains an active member of the business community through its involvement with the Union of Manufacturers and Businessmen of Armenia (UMBA), the Armenian British Business Chamber (ABBC), and the European Business Association of Armenia (EBA).

Our engagement in these organizations reflects the Company's broader commitment to social responsibility and community involvement, further supported by the "Zangezur Copper and Molybdenum Combine" Charity Foundation.

Business Model and Value Chain

GRI 2-6

Ore Mining and Processing Operations

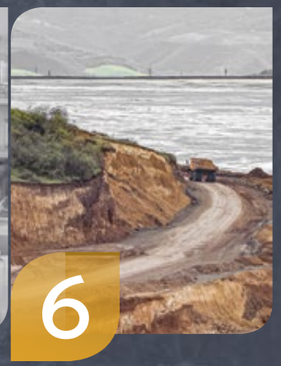
The ore mining process starts with planned drilling and blasting operations, which are essential for breaking up the rock and accessing the ore body. These basic activities are performed with an emphasis on precision and safety to maximize ore recovery and reduce environmental impact.

Supporting the ore extraction process is a series of critical maintenance and operational support activities, including bench upkeep, road maintenance, and dust control. These functions are integral to maintain safe working conditions, ensuring uninterrupted operations, and reducing the environmental footprint of mining activities, particularly in terms of air quality and land management.

Once the ore has been extracted and crushed, it is transported to the processing plant, where it undergoes a sequence of mechanical treatments. The ore is first grounded into fine particles, then it is processed through froth flotation, a separation technique that utilizes chemical reagents and air bubbles to recover minerals selectively. This method enables the efficient extraction of valuable components, resulting in the production of two principal concentrates: copper concentrate and molybdenum concentrate.

After flotation, the concentrates are subjected to dewatering, a process that removes excess moisture. This step enhances material handling, reduces transport costs, and prepares the product for shipment and further processing by downstream partners.

Both ore and concentrate samples undergo quality control testing. This includes flotation performance evaluations, chemical and physical analyses to ensure that the final products meet internal standards and align with client specifications.



The tailings produced during ore processing are transported to the Artsvanik Tailings Storage Facility (TSF), located within the Kapan community. This upstream-constructed facility features a retaining dam designed for efficient water management and is engineered to safely contain the residual materials generated by mining and processing operations. A network of pipelines and channels, running along the left bank of the Voghji River, links the processing plant to the TSF, ensuring the safe, consistent, and environmentally sound transport of tailings.

Value Chain

The value chain covers the full spectrum of the Company's core operations, including the extraction of ore, its processing into copper and molybdenum concentrates, and the commercialization and sale of these end products. Each stage of the value chain adds value by transforming raw geological resources into refined, marketable concentrates that serve as essential inputs for various global industries.

The supply chain supports these operations by ensuring a consistent and efficient flow of inputs and services. It comprises a wide range of stakeholders, including suppliers of raw materials and consumables, providers of mining equipment and machinery, energy suppliers, and contracted service providers involved in areas such as maintenance, logistics, and technical support. These partners play a critical role in enabling safe, efficient, and sustainable mining and production activities.

On the downstream side, the Company's products are primarily sold to smelters and metal processing companies that refine concentrates into pure copper and molybdenum for use in various sectors, including construction, electronics, and automotive manufacturing.

In addition to commercial relationships, the Company maintains active engagement with other key stakeholders. These include the RA Government authorities, who oversee regulatory compliance and permitting; local communities, whose well-being is central to the Company's social responsibility commitments; labor unions, civil society, local NGOs, representing the interests of employees; and industry associations, which promote collaboration, knowledge exchange, and responsible mining standards.

There have been no significant changes reported in business activities or relationships during the reporting period.

Supply Chain Responsibility

GRI 3-3

12 RESPONSIBLE CONSUMPTION AND PRODUCTION

In 2024, ZCMC continued to strengthen its approach to responsible supply chain management. An assessment of the procurement process was conducted by Grant Thornton Consulting CJSC, based on ISO 20400:2017 and best international procurement practices. This assessment aimed to ensure that ZCMC's procurement processes align with sustainable procurement standards and leading practices. As a result, the Procurement Policy was developed and approved for deployment with a strengthened focus on sustainability. As a next step to level up sustainability across its Supply Chain, the Procurement Guideline with detailed working procedures is expected to be finalized and approved in 2025. In parallel, new methods are also being developed to govern warehouse operations, covering areas such as health and safety, good manufacturing practices, and housekeeping standards, as well as the management of scrap and idle materials.

In 2024, ZCMC implemented a significant restructuring of its supply chain function by establishing the Inventory and Planning Management Department. This new department consolidates warehouse operations, oversees idle materials, and manages normative and reference data. Its primary objectives are to centralize planning processes, optimize inventory levels, and enhance the efficiency of working capital utilization. As part of this broader transformation, the Company also formed an Auction Committee for Idle Materials in 2024 and introduced new tools for inventory forecasting, further strengthening the supply chain capabilities.

The Commercial Directorate, responsible for the supply chain management, operates under the oversight of the Executive Director. The Commercial Director oversees the following four departments of the mentioned Directorate: Inventory and Planning Management Department, OPEX procurement, CAPEX procurement, and Logistics.

The effectiveness of ZCMC's supply chain management is evaluated using a comprehensive set of performance metrics, including stock level optimization, warehouse efficiency, procurement performance, idle asset utilization, financial outcomes, compliance and audit results.

For 2024 and the medium term, the Company has set strategic goals centered on inventory optimization, cost efficiency, and environmental sustainability.

Key Performance Indicators to support these objectives include:

- **Inventory management:** increasing inventory turnover ratio, reducing inventory cost per ton produced, minimizing non-liquid inventory, and maintaining optimal safety stock levels.
- **Procurement:** improving forecast accuracy, reducing out-of-stock rates and procurement lead time, optimizing payment terms, reducing procurement violations, and achieving better purchase prices.
- **Sustainability:** lowering CO_2 emissions through CAPEX.

To further support these goals, ZCMC plans to implement automated inventory management systems, enhance reporting capabilities for greater transparency and sustainability tracking, and optimize warehouse operations to reduce environmental impact.

When evaluating new suppliers, ZCMC applies social and operational criteria, including cost and lead time, product certification, as well as testing and quality assurance standards. A positive social impact on local communities is also taken into account. Supplier compliance is assessed through document verification, sample testing, and evaluation of lead times and local sourcing. If a supplier does not comply with these criteria, measures such as requests for corrective actions, reevaluation, and potential disqualification may be considered.

GRI 301-1

The total volume of materials used for the production and packaging of the Company's primary products during the reporting period is outlined below.

Materials used in production and packaging

Material	Metric	2023	2024	Percentage change
Oil	liter	3,513	**2,163**	-38.4%
Lubricants	liter	98,587	**93,014**	-5.7%
Balls	ton	14,982	**15,305**	2.2%
Quick lime and Lime More than 80 % activated	ton	16,803	**11,678**	-30.5%
Pine oil	ton	89.0	**123**	38.2%
Foaming agent	ton	250.0	**273**	9.2%
Xantogenate	ton	473	**499**	5.5%
Sodium sulfide and sodium hydrosulfide	ton	11,750	**13,239**	12.7%

[1] While majority of newly engaged suppliers have undergone and met the established criteria, precise quantitative data is currently unavailable.

Economic Impact: Contributing to Local and National Development

23 — Economic Impact in Numbers
27 — Tax Governance: Transparency and Executive Accountability
29 — ESG Risk Landscape and Financial Consequences
30 — Procurement and Economic Development

GRI 3-3

8 DECENT WORK AND ECONOMIC GROWTH

Building on the foundation established in previous years, we have strengthened the alignment with our Policies, Stakeholder Engagement Plan, and other key internal frameworks that guide how we manage economic impacts and engage with stakeholders. During this reporting year, the Company has maintained its commitment to sustainable economic growth by advancing its financial and community investment strategies.

Executive leadership continues to play a crucial role in shaping strategic direction, approving economic policies, and promoting responsible financial management. The First Deputy General Director and Financial Director remain essential for executing our economic impact strategies, ensuring compliance, and maintaining transparency in financial reporting.

This year, our efforts continued to focus on enhancing economic resilience and fostering inclusive growth at both the local and national levels. We continued to take steps to increase/maintain local procurement levels, expand community infrastructure investments, and deepen stakeholder engagement.

Economic Impact in Numbers

ZCMC continues to play a pivotal role in the Armenian economy, making significant contributions to both local and national development. In 2024, the Company generated its total revenue of USD 713.1 million, as reported in the audited annual financial statements, representing a 10.4% decrease from 2023. This decrease was primarily attributed to the geological characteristics of the ore body mined during the year. Despite the decline in total revenue, we remained the number one taxpayer of Armenia as of 2024. ZCMC contributed around USD 216 million to the state budget through corporate income tax and royalty payments, reinforcing its position as a key economic player.

The detailed numeric results of the Company's economic impact for the reporting year are presented below.

GRI 201-1, SASB EM-MM-000.A

Economic impact (in million USD)

Indicator	2023	2024	Percentage change
1. Direct economic value created	**795.8**	**713.1**	**-10.4%**
Income (revenue)	795.8	**713.1**	-10.4%
2. Allocated economic value	**619.5**	**1,009.5**	**63.0%**
Operating expenses	289.9	**317.8**	9.6%
Wages, salaries, and employee benefits	117.1	**120.1**	2.6%
Payments to capital providers (dividends)	0	**337.6**	-
Payments to the state, including:	212.5	**234.0**	10.1%
– Corporate income tax	56.7	**48.6**	-14.3%
– Royalties	135.6	**167.2**	23.3%
– Investments in local communities (donations)	20.2	**18.3**	-9.4%
3. Retained economic value (1 — 2)	**176.3**	**–296.4**	**-268.1%**

Total revenue generated by the Company in 2024

$713.1 million

ZCMC contributions to the state budget, around

$216 million

Overview of Main Performance Indicators for 2024

GRI 207-4

Indicators	ZCMC CJSC 2023	ZCMC CJSC 2024	Ler-Ex LLC 2023	Ler-Ex LLC 2024
Number of employees (as of 31 December in exact number)	4,666	4,654	114	115
Revenues from third-party sales	$795.787 million	$713.087 million	$3.104 million	$2.827 million
Revenues from intra-group transactions with other tax jurisdictions	$0 million	$0 million	$0 million	$0 million
Profit/loss before tax	$363.308 million	$215.030 million	$ -103.513 million	$ -0.515 million
Tangible assets other than cash and cash equivalents:				
Property, plant and equipment	$547.932 million	$614.268 million	$2.046 million	$1.879 million
Inventories	$96.670 million	$90.419 million	$0.150 million	$0.157 million
Corporate income tax paid on a cash basis	$29.263 million	$48.570 million	$0 million	$0 million
Corporate income tax accrued on profit/loss	$56.671 million	$42.341 million	$0 million	$0 million

ZCMC is also one of Armenia's largest exporters, accounting for approximately 5–7% of the country's total exports. The Company's direct contribution to Armenia's GDP is estimated at around 2–3%, primarily through value added in the mining and processing of copper and molybdenum concentrates. Indirect and induced economic effects across the national economy further amplify this impact.

The Company's direct contribution to Armenia's GDP is estimated at around

2–3%

Tax Governance: Transparency and Executive Accountability

GRI 3-3

Indirect economic impact

GRI 203-2

ZCMC's operations have a substantial indirect economic impact, with an estimated employment multiplier effect of 5. This multiplier effect extends the Company's influence beyond its direct workforce, indirectly supporting up to 20,000 additional jobs.

These jobs are created through a network of suppliers, service providers, and the broader economic ecosystem that benefits from both employee, contractors and corporate spending. The sectors impacted include logistics, maintenance, retail, and various auxiliary services.

Tax Governance and Compliance

GRI 207-2

ZCMC maintains a robust tax governance and control framework, ensuring alignment with local legislation and international financial reporting standards. The First Deputy General Director and Financial Director hold accountability for tax strategy, oversight, and compliance.

Tax compliance is incorporated into the Company's overall corporate governance and internal control systems. Multiple disciplines, including the Finance and Legal Departments review all decisions with material tax implications.

In 2024, ZCMC's tax disclosures, including income taxes paid and deferred tax liabilities, are externally assured through the Company's annual financial statement audits, conducted by a Big Four accounting firm. These audits confirm the accuracy and transparency of tax reporting in line with IFRS requirements, with the resulting audit opinions published in the Company's annual financial statement.

Public Policy: Engagement with Tax Authorities and Stakeholders

GRI 3-3, 207-3, 415-1

We maintain a transparent and collaborative relationship with Armenian tax authorities, primarily overseen by the First Deputy General Director and Financial Director. This engagement involves regular communication on tax filings, compliance audits, and legislative updates. While ZCMC does not actively advocate for public policy changes in tax matters, it participates in government consultations when invited, particularly on proposed reforms that affect the mining sector.

The First Deputy General Director is also the elected Chairman (a rotating position) of the Union of Mining and Metallurgical Companies of Armenia. In this capacity, ZCMC is actively involved in industry-related public policy discussions and lobbying initiatives. It is also worth noting that since mid-2025, the Sustainable Development Director and the First Deputy General Director have been members of the Working Group on Mining Strategy Implementation in the RA at MTUI.

Employees can raise ethical or legal concerns through the mechanisms outlined in the Whistleblowing Policy or informally through supervisory channels or by contacting the individuals mentioned in the Policy. The development of the Grievance Mechanism is under review as part of the Company's broader efforts to improve governance practices.

Stakeholder engagement on tax matters remains informal. While the Company maintains regular dialogue with community members, employees, public officials and EITI on sustainability and operational issues, there is currently no dedicated platform for gathering stakeholder input on tax-specific topics.

We did not make any political contributions, monetary or in-kind, during the 2024 reporting period. The Company maintains a strict policy of political neutrality, fully complying with national laws governing corporate involvement in political activities.

ESG Risk Landscape and Financial Consequences

Our Company is actively working to improve its internal framework to assess the financial impact of the key ESG risks and opportunities. Although a formal ESG risk register has not yet been established, the Company uses a qualitative assessment approach to identify and consider ESG-related financial impacts in its strategic planning and investment decisions. The table below outlines key ESG risk categories along with indicative levels of potential economic impact.

Risk Area	Estimated Economic Impact	Key Implications
Regulatory Changes	High	Increased compliance costs and possible need for capital investments
Climate Risks	Medium to High	Operational disruptions, cost increases, and adaptation investments
ESG Ratings and Investor Expectations	Medium	Potential impact on capital access and cost of financing
Community Relations	Medium to High	Delays in operations or production due to unresolved community concerns

ZCMC recognizes the growing importance of establishing a robust quantitative risk assessment framework that aligns with leading global standards, particularly in the context of climate-related financial disclosures such as those recommended by the TCFD.

While such a framework is not yet in place, the Company has identified it as a strategic priority. Preparatory steps, including internal capacity building, data readiness, and methodological planning, are scheduled for the short to medium term, with implementation dependent on resource availability and organizational readiness.

Procurement and Economic Development

GRI 3-3

Since 2022, ZCMC has systematically collected and analyzed data on its procurement activities, including the annual number of goods and service suppliers, associated expenditures, and the geographic distribution of sourcing, with a particular focus on the balance between local and external procurement. This effort reflects the Company's ongoing commitment to strengthening local procurement practices.

Several positive examples, summarized below, demonstrate how local procurement has been boosted based on recommendations in the draft Local Procurement Plan. These cases illustrate how strategic planning and targeted actions can enhance local sourcing, thereby supporting regional economic development.

Annual procurement analysis offers valuable insights into sourcing patterns, both within Armenia and across other regions, including Europe, China and Russia. More importantly, it highlights areas where improvements can be made and identifies opportunities to expand engagement with local suppliers, particularly in communities directly impacted by the Company's operations. Local procurement data analysis and updates are regularly collected and reflected in ZCMC's semi-annual social updates.

ZCMC is committed to promoting local procurement ,thereby boosting the local[2] economy and creating economically viable communities around ZCMC.

The Company's commitment to local procurement is evident: 51.4% of the goods were purchased from 380 local (Armenian) suppliers, and 92.5% of the services were contracted from 430 local service providers in Armenia. Thus, on average, 71.5% of total procurement was sourced locally.

In 2024, the total procurement of goods and services amounted to approximately USD 327 million, with an even split between services and goods. USD 235 million, or approximately 72% of the total procurement, was allocated to local purchases of goods and services from 810 companies operating in Armenia. This contributes to job creation, strengthens local businesses, and supports economic growth in the country.

Breakdown of goods and services purchases/Purchases Breakdown: Goods and Services (in USD)

Services
$162,744,085

Goods
$164,594,957

Total
$327,339,042

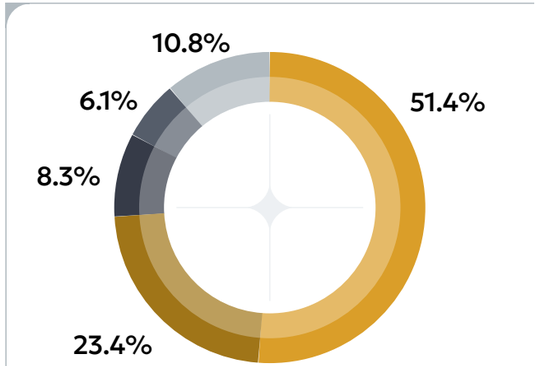
[2] In this context, «local» refers to communities in ZCMC direct impact zone, with priority given to adjacent communities, followed by other regions of Armenia.

Procurement of Goods[3]

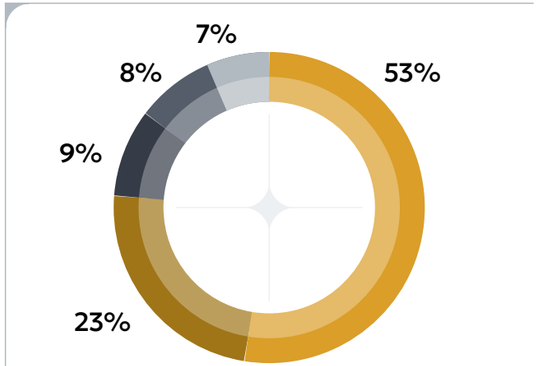
Compared to 2023, the share of local procurement of goods remained unchanged — 51.4%, while procurement of goods from Russia increased at the expense of EU-sourced purchases.

As for the number of suppliers, the majority are based in Armenia, accounting for 53% of the total; Russia represents the second-largest group of suppliers, at 23%, followed by China at 9%.

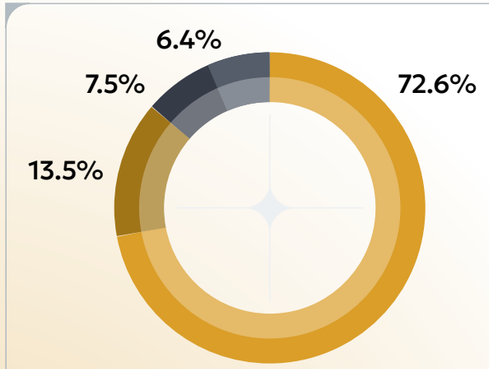
Geography of procurement of goods per amount in 2024



Geography of procurement of goods per number of companies in 2024



Geographic breakdown of purchase of goods within Armenia



Within Armenia, 72.6% of goods were purchased from Yerevan, followed by Syunik Marz with 13.5%, the Company's primary area of operations.

Of the total procurement within Syunik Marz:

- 48% originates from Kapan;
- 26% — from Kajaran;
- 24% — from Agarak;
- 1.5% — from other locations in Syunik Marz;
- 0.5% — from Goris.

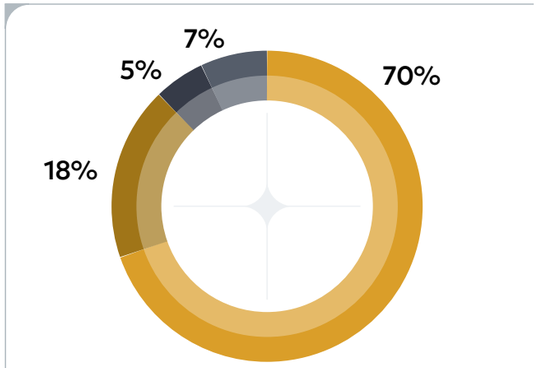
[3] Other countries include Kazakhstan, India, Geogia, Canada, etc.

Suppliers of Goods within Armenia

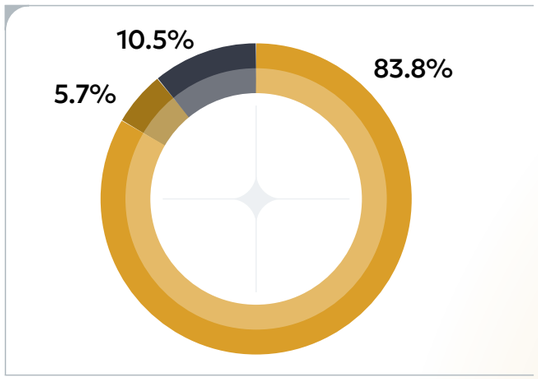
Out of 380 local goods suppliers in Armenia, 70% are based in Yerevan, while 18% operate in Syunik Marz. The remaining suppliers are located in Kotayk and other regions, as illustrated below.

The breakdown of the largest categories of total goods (excluding local) purchases is presented below.

Geography of local suppliers of goods in 2024 in Armenia



Geography of procurement of services per number of companies in 2024



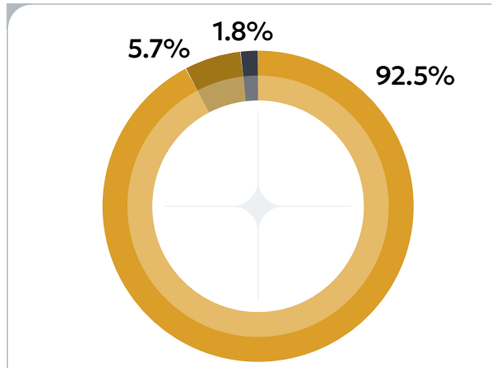
Procurement of Services

GRI 204-1

The share of local procurement of services accounted for 92.5% in 2024, representing a slight decrease from 2023, yet still a significant majority of the total.

Regarding suppliers of services, approximately 84% are based in Armenia.

Geographic breakdown of procurement of services by monetary value in 2024

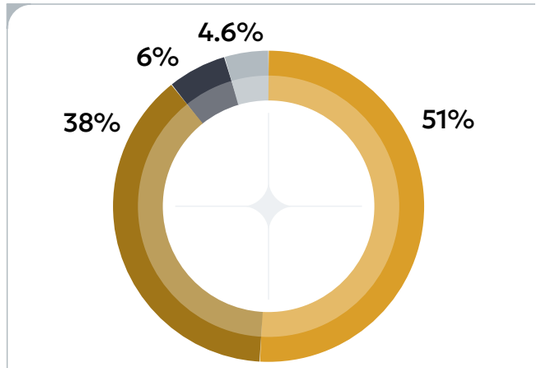


Categories of goods purchased in 2024

Category	Percentage
Fixed assets	22%
Spare parts	19%
Fuel	18%
Reagents	8.5%
Steel balls	7.4%
Raw material	7%
Other	18%

The geographic breakdown of the services purchased within Armenia looks as follows: Yerevan, accounting for 51%, followed by Syunik Marz. The remaining services were acquired from Armavir and Kotayk Marzes.

Proportion of puchase of services within Armenia



Within Syunik, nearly all service procurement, approximately 90%, is concentrated in Kapan, Kajaran, and the surrounding villages.

The largest categories of total services purchased (not local) are presented in the table below:

Largest categories of total services purchased in 2024

Service Category	Percentage
Logistics	33%
Energy/Power	22%
Technical maintenance	16%
Professional services	14%
Processing of raw material, drilling, blasting	5%
Rentals	6%
Other	4%

In 2024, the social team within the Sustainable Development Directorate conducted a small study of local businesses in Syunik Marz that were included in the ZCMC procurement database as suppliers. The primary goal of this study was to analyze the revenue trends of target companies for the period from 2022 to 2024.

A total of 55 companies were surveyed, with 11 showing positive revenue growth. The average revenue growth for the period 2022–2023 was 35.5%, and for 2023–2024 it was 39.6%. Thus, 20% of the companies in the sample demonstrated consistent growth, highlighting the positive impact of ZCMC's local procurement efforts. Of the 55 companies surveyed, the top 3 showed exceptional growth in just two years, more than doubling their revenue throughout the observed period.

To summarize, while the survey highlighted successful examples of local businesses thriving through ZCMC's local procurement efforts, it also reveals significant potential for further growth and improvement. Key actions to take include:

- Strengthen the «local procurement» program by increasing the share of goods sourced from suppliers in Syunik Marz.
- Conduct further analysis to identify factors limiting growth for the remaining 80% of companies and develop support strategies.
- Showcase successful case studies as models for other local manufacturers, and
- Seek ways to expand the range of goods and services obtained from local suppliers. Continuous efforts to improve local procurement will benefit businesses in Syunik Marz, generate new employment opportunities, increase tax revenues, and strengthen the area's overall economy.

A successful initiative launched in 2024 involves the procurement of yogurt from a local entrepreneur in Kajaran. Following a thorough evaluation to ensure compliance with food safety and quality standards, ZCMC established a supply partnership that supports local enterprises while providing high-quality and safe products for our staff.

Challenges and Progress in Local Procurement

While ZCMC remains committed to increasing local procurement from the broader Syunik Marz, progress has been tempered by several ongoing challenges. Existing procurement patterns and long-standing relationships with established suppliers have created structural inertia, making the transition toward a more localized sourcing complex. Moreover, many businesses in Syunik face difficulties in meeting the Company's standards, which limit their capacity to qualify as suppliers. Addressing these challenges remains a priority as we continue to explore opportunities to strengthen local supply chains and build supplier capacity in the region.

Corporate Governance: Upholding Integrity in Leadership

40 — Corporate Governance Structure: Ensuring Effective Management and Oversight
45 — Accountability in Impact Management: Advancing Strategic Leadership in Sustainability
46 — Integrity in Decision-Making: Strengthening Governance Through Conflict-of-Interest Management
47 — Compensation Strategy: Aligning Pay with Strategic Objectives and Performance Outcomes
49 — Anti-Corruption Commitment: Upholding Ethical Standards and Compliance
52 — Compliance with Laws and Regulations: Ensuring Legal Adherence and Ethical Governance
53 — Digital Transformation Initiative: Shifting to Digital Across Operations

Corporate Governance Overview

GRI 3-3, 2-23, 2-24

ZCMC is committed to achieving the highest standards of corporate governance, with a strong focus on integrity, transparency, and accountability. We continuously enhance our governance framework to foster stakeholder trust and support in reaching our long-term goals.

We prioritizes transparency and accountability by providing clear, accurate, and timely information to trust of our stakeholders. We publish financial statements and sustainability updates, facilitate direct engagement through regular shareholder meetings, and implement internal controls and auditing processes to ensure the integrity of our data. Our Company adheres to the EITI principles for transparency in the mining sector It aligns its sustainability reporting with the GRI standard, TCFD recommendations, and SASB standards, while also initiating alignment with IFRS S2.

Competition Compliance Program

In line with our commitment to transparency and accountability, ZCMC has developed a Competition Compliance Program, which is planned to be approved in 2025. To support the implementation of this initiative and further strengthen compliance across operations, ZCMC intends to establish a new Compliance service under the supervision of the Deputy General Director. This service will encompass two crucial directions — General Compliance and Competition Compliance. Key responsibilities for General Compliance include monitoring and screening counterparties and business partners, as well as aligning the Company's policies with applicable laws, regulations, and international standards. Meanwhile, the Competition Compliance Coordinator will oversee the implementation of the Competition Compliance Program, which plays a role in upholding antimonopoly principles and fair bidding practices. Hence, transparent procurement practice attracts better quality bids, helps to secure best value prices, and achieve better outcomes with minimal risks.

We integrate responsibility into all aspects of our operations, fully recognizing the impact of our decisions on a wide range of stakeholders, including employees, suppliers, communities, and the environment. ZCMC is committed to ethical business conduct, fair labor practices, safe working conditions, minimizing environmental and any possible adverse social impacts, and, where possible, maximizing positive impact.

In alignment with our 2023 commitment, ZCMC developed and approved several key policies in 2024. The Board of Directors of ZCMC formally endorsed these on 27 November 2024. Considering that Policies were adopted at the end of 2024, trainings for the governance body members and employees are planned for 2025.

Anti-Corruption Policy
Designed to prevent corruption and bribery in all business dealings, fostering a culture of transparency and ethical conduct.
1

Biodiversity Policy
Outlines the Company's commitment to protecting and enhancing biodiversity across its operational areas. It focuses on strategies to preserve nature, promote ecological balance, and ensure that business activities do not adversely affect the local ecosystem.
2

Climate Change Policy
Sets out strategies to mitigate the impacts of climate change and safeguard biodiversity through targeted measures aimed at reducing emissions and protecting ecosystems.
3

Code of Conduct
Defines the ethical standards and expectations for employee behavior, ensuring that all business activities are carried out with integrity and in full compliance with applicable laws.
4

Environmental Policy
Demonstrates its commitment to environmental sustainability by reducing its carbon footprint, managing waste effectively, and conserving natural resources.
5

Grievance Policy
Provides a structured process for employees to raise concerns or complaints about workplace issues, ensuring that all matters are addressed fairly and in a timely manner.
6

Human Rights Policy
Outlines the Company's commitment to respecting and promoting human rights across all its operations and business relationships.
7

Local Employment Policy
Emphasizes local hiring practices and supports the development of local talent, contributing to the community's economic growth.
8

Social Policy
It underscores the Company's commitment to social responsibility, which encompasses community engagement, social equity, and ethical business practices.
9

Whistleblowing Policy
Provides employees with a means to report unethical or illegal activities within the Company without fear of retaliation, ensuring that whistleblowers are protected and their concerns are thoroughly investigated.
10

Occupational Health and Safety Policy
Designed to protect employees by identifying potential hazards, implementing adequate safety measures, and fostering a strong safety culture.
11

Policy Against Workplace Violence, Discrimination, Harassment, and Retaliation
Designed to foster a safe and respectful work environment by strictly prohibiting all forms of inappropriate behavior. It also establishes clear procedures for reporting and effectively addressing any such incidents.
12

The Company has developed a Procurement Policy, scheduled for approval in 2025, to regulate the procurement of goods, works, and services essential for its operations. The Policy emphasizes core principles such as Value for Money, Economy, Efficiency, Fairness, Transparency, and Quality. It aims to enhance transparency, establish fair competition, and prevent corruption risks while ensuring efficient use of funds.

These policies demonstrate the Company's dedication to aligning its business conduct with the best international practices and upholding ethical standards, advancing social responsibility, and promoting sustainable development across all aspects of its operations.

Corporate Governance Structure: Ensuring Effective Management and Oversight

GRI 2-9, 2-10

General Meeting of Shareholders

The General Meeting of Shareholders[4] is the highest governance body of ZCMC. The Company holds its Annual General Meeting once per year, after the close of the financial year, within the period from February 1st to June 30th.

Any general meetings convened outside of the Annual General Meeting are considered extraordinary general meetings. Extraordinary general meetings may be convened by a decision of the Board of Directors, either on its own initiative or at the request of the Company's executive body, the auditor, or shareholder(s) holding at least 10 percent of the voting shares at the time the request is submitted.

Decisions of the General Meeting are made by a simple majority of votes of the shareholders holding voting shares who are present at the General Meeting, unless a higher voting threshold is required by the Law of the Republic of Armenia "On Joint Stock Companies" or by the Charter of ZCMC.

[4] Authorities of the General Meeting are listed in the Charter of ZCMC.

Committees of the General Meeting

The General Meeting has the authority to establish the Revision Committee[5] and the Counting Committee.

The Revision Committee, established by the General Meeting, is responsible for overseeing the Company's financial and economic activities, monitoring the implementation of decisions made by the management bodies, and ensuring that the Company's documents are consistent with applicable laws, legal acts, and the Company Charter. The Revision Committee also reviews the annual results of the Company's financial and economic performance. It may initiate examinations on its own initiative, by decision of the General Meeting or the Board of Directors, or at the request of shareholders holding at least 10 percent of the Company's voting shares.

Although the Company's Charter grants the General Meeting the authority to establish a Counting Committee, no such committee was formed for the reporting year. However, as outlined in clause 61 of ZCMC's Charter, in the absence of a Counting Committee, its functions are carried out by the Secretary of the Board of Directors, also known as the Corporate Secretary. The Corporate Secretary has performed these responsibilities for the past two reporting years.

The responsibilities of the Counting Committee stipulated by the Charter are to ensure the proper conduct of voting procedures and safeguarding shareholders' rights to participate in the voting process, implement the vote count, summarize the voting results, prepare the protocol, and transfer the voting bulletins to the archive of ZCMC. The Counting Committee may not include members of the Board of Directors, the Revision Committee, the General Director, or individuals nominated as candidates for these positions.

These Committees are crucial in maintaining transparency and accountability within the Company.

Communication of Critical Concerns

GRI 2-16

Critical concerns are communicated to the General Meeting of Shareholders through Annual and Extraordinary General Meetings. The Annual General Meeting serves as a formal platform for discussing the Company's performance and strategic direction.

ZCMC has also established structured processes for communicating critical concerns to the Company, as outlined in its Code of Conduct, Grievance Policy, and Whistleblowing Policy. Employees and stakeholders can report concerns through formal channels, ensuring confidentiality and protection against retaliation.

Pursuant to the Code of Conduct, the Compliance Committee, chaired by the Sustainable Development Director and including senior executives, is responsible for escalating critical concerns, including ethical violations, workplace misconduct, operational risks, and those reported under the Whistleblowing Policy. This ensures that any reported concerns are thoroughly reviewed and addressed in accordance with internal policies.

[5] In the 2023 Sustainability Report, the Committee was referred to as the "Audit Committee" due to a translation error in the Charter. In the current 2024 Report, the correct name "Revision Committee" is used to reflect the accurate terminology.

The Compliance Committee[6] is composed of the following members:

1. Sustainable Development Director (the Chair)
2. Executive Director
3. The First Deputy General Director
4. Deputy General Director — Administration
5. Financial Director
6. Head of Legal Department

Additionally, weekly meetings are held with the General Director and all department heads, during which each department provides an overview of the previous week's activities and outlines upcoming tasks and plans. These meetings serve as a platform for department heads to raise critical operational issues and seek guidance from the General Director. When needed, individual meetings with the management are organized, and written protocols are submitted to address key issues cand projects in greater detail.

Performance Evaluation

GRI 2-18

Currently, there are no established processes for evaluating the performance of the highest governance body — the General Meeting of Shareholders. However, the General Meeting of Shareholders retains the authority to evaluate the performance of Board Members, the General Director, and make strategic decisions regarding ZCMC's governance structure. The General Meeting also has the authority to appoint and remove the Board Members.

Role of the Highest Governance Body in Overseeing Impact Management

GRI 2-12

The Company's purpose, values, and mission are defined in the Code of Conduct and the policies of ZCMC.

The Board of Directors reviews and approves key corporate strategies and policies, including those related to grievance management, anti-corruption, stakeholder engagement, compliance mechanisms, and sustainability strategies. Nonetheless, the Board and executive management ensure that the General Meeting of Shareholders remains well-informed through regular reporting and transparent communication.

The development of due diligence processes, particularly those focused on identifying and managing the Company's economic, environmental, and social impacts, is overseen by the Board of Directors, with the support of the General Meeting of Shareholders.

Responsibility for reviewing the effectiveness of governance processes, particularly those related to sustainable development, rests with the General Director. Through the various meetings and initiatives, the General Director evaluates the implementation and impact of corporate strategies and policies, promoting continuous improvement in governance practices and sustainability performance.

Board of Directors

GRI 2-9, 2-10

The Board of Directors of ZCMC implements the strategic governance of the Company's activities. Members of the Board of Directors are elected by the General Meeting of Shareholders.

The nomination and election processes are outlined in the Company's Charter and the Regulations of the Board of Directors. Members are elected through cumulative voting, with the candidates receiving the highest number of votes securing positions on the Board of Directors. To ensure balanced governance, representatives of the executive body may not constitute a majority on the Board of Directors. Shareholders holding 10% or more of the Company's allocated voting shares are entitled to a seat on the Board of Directors or may appoint a representative without election. Each shareholder is limited to one seat on the Board. The Chairman of the Board of Directors shall be elected by the Board members from among themselves by a majority vote of the total number of votes of the Board members.

To effectively execute its responsibilities, the Board is authorized to establish specialized committees. These may include Board members, Company executives, employees, or external experts. While these committees are advisory, they contribute to informed decision-making and operational oversight.

In accordance with the Charter, the Board of Directors must comprise between five and nine members. Currently, it consists of seven, primarily non-executive members[7]. The Board demonstrates strong collective expertise in key areas, including mining operations, financial management and legal affairs. Board members serve without a fixed term and remain in the office until re-elected or replaced by the General Meeting of Shareholders.

Currently, the Board is predominantly male, with only one female member. It does not include formal stakeholder representatives outside the shareholder structure. While we do not yet have sustainability expertise at the Board level, the importance of sustainability is highlighted with direct oversight by the General Director and the frequent engagement of the Board of Directors with the Sustainable Development Director.

Meetings of the Board of Directors are conducted flexibly, allowing members to participate jointly through various means such as telephone, telecommunication, or other real-time communication methods, or by remote voting, unless the Company Charter specifies otherwise. This flexible format proved particularly valuable in 2023, during which two Board meetings were held. Meetings are convened as needed, but at a minimum, at least once every six months.

While the Chairman typically initiates meetings of the Board of Directors, they may also be initiated at the request of any Board member, the Revision Committee, the executive body, the auditor, or shareholders holding at least 10 percent of the Company's voting shares. This inclusive approach ensures that all key stakeholders have the opportunity to contribute to the decision-making process.

[6] The detailed regulation of the Compliance Committee is planned to be developed in 2025.

[7] Two Board members hold executive roles within ZCMC.

Chairman of the Board of Directors

GRI 2-11

The Chairman of the Board of Directors is distinct from the executive body, establishing a governance structure that clearly separates strategic oversight from management.

The Chairman presides over meetings of the Board of Directors. In the Chairman's absence, the Board may designate another member to assume the Chairman's responsibilities.

Executive Management — General Director

ZCMC operates with a sole executive body of management, led by the General Director. The General Director is responsible for managing the Company's daily activities and is elected by the General Meeting of Shareholders.

Accountability in Impact Management: Advancing Strategic Leadership in Sustainability

GRI 2-12, 2-13

We aim to embed impact management within the Company's leadership structure, ensure accountability and alignment with strategic goals.

Oversight responsibilities are vested in the General Director and the Board of Directors, demonstrating top-level commitment to addressing the Company's economic, environmental, and social impacts. Within this governance framework, the Sustainable Development Director is responsible for overseeing all aspects of sustainable development. Currently, no other employees are assigned specific impact management duties, reinforcing a centralized decision-making process for key issues.

The General Director plays a key role in executing this strategy by issuing binding orders and instructions to all staff. These directives ensure uniform policy implementation across departments and uphold a consistent approach to sustainability and impact-related issues throughout the Company.

GRI 2-14

ZCMC's senior management reviews and approves the sustainability report. While the Board of Directors and the General Meeting of Shareholders do not directly oversee the sustainability report, they are periodically briefed on ESG matters to ensure alignment with corporate objectives.

Integrity in Decision-Making: Strengthening Governance Through Conflict-of-Interest Management

GRI 2-15

In its commitment to ethical governance and responsible decision-making, ZCMC ensures that the principles for managing conflicts of interest are clearly defined and upheld throughout the Company. Instead of implementing a standalone Conflict of Interest Policy, the Company has incorporated relevant provisions into its Code of Conduct. This approach demonstrates our Company's commitment to embedding integrity and transparency into our daily business practices.

The Code of Conduct (CoC), outlines expectations for all employees, including senior management and the Board, to act in the Company's best interests and avoid personal considerations that could influence their decision-making. CoC defines conflicts of interest and provides guidelines for identifying, disclosing, and managing them.

Conflicts of interest and related party transactions are not disclosed externally, as current practice focuses on internal resolution; disclosures are made externally only if required by the relevant legislation. ZCMC ensures transparency regarding conflicts of interest through its governance framework. CoC mandates internal reporting and proactive conflict resolution.

The Anti-Corruption Policy (additional details can be found on page 49 of this report) further prohibits bribes, kickbacks, facilitation payments, quid pro quo arrangements, clientelism, nepotism, favoritism, sponsorship, revolving doors, and excessive or inappropriate gifts and hospitality, thereby reinforcing ethical practices.

Compensation Strategy: Aligning Pay with Strategic Objectives and Performance Outcomes

GRI 2-19, 2-20

As ZCMC continues to grow and evolve, strengthening corporate governance and ensuring fair, performance-driven compensation have become key focus areas. In line with this commitment, the Company took a significant step forward in 2024.

While a formal Remuneration Policy and a dedicated Remuneration Committee were not yet in place as of the 2024 reporting year, the Financial Directorate, recognized the need for a more structured approach to executive compensation and initiated the development of a formal Motivational Policy for the executive positions.

Planned for implementation by 2026, the new policy will introduce a transparent, KPI-based framework. Executive compensation will be linked not only to financial and operational results, but also to environmental, social, and governance performance indicators. By integrating ESG-related KPIs into individual performance assessments, ZCMC aims to align leadership incentives with its broader strategic goals, fostering accountability, sustainability, and long-term value creation.

Within the framework of the approved Motivational Policy for executive positions, ZCMC has established ESG-related KPIs to be monitored and formally linked to annual performance-based bonuses for these positions. **These ESG KPIs include:**

Improvement of ESG Ratings:

progress in third-party ESG assessments serves as a benchmark for strategic sustainability alignment.

Total Recordable Injury Frequency Rate (TRIFR):

this safety metric is a core performance indicator, reflecting ZCMC's commitment to occupational health and safety.

Environmental Compliance and Efficiency:

metrics related to regulatory compliance and reduction of environmental impact are also tracked.

Social and Community Engagement:

performance evaluations include contributions to local development, stakeholder responsiveness, grievance redress and the implementation of social investment programs.

These indicators form part of ZCMC's broader effort to integrate sustainability into governance and incentive systems, ensuring that executive performance reflects both financial and non-financial responsibilities.

Shareholder perspectives are incorporated into remuneration matters through direct Board representation and participation in the voting process. The General Meeting of Shareholders holds responsibility for setting the compensation of both the Board of Directors and the General Director.

Anti-Corruption Commitment: Upholding Ethical Standards and Compliance

GRI 3-3, 205-1, 205-2, SASB EM-MM-510a.1

The Company's commitment to the highest ethical standards is evidenced by its zero-tolerance policy for corruption.

According to the Anti-Corruption Policy, corruption contradicts the Company's core values, 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.

The corresponding Anti-Corruption Regulation is currently in the final stages of development and adoption, which will then identify the respective roles and responsibilities. The Anti-Corruption Policy is publicly available on ZCMC's website and has been shared with its employees. As mentioned above, training is planned for all employees during the next reporting year.

Development of targeted policies reflects the Company's proactive stance in promoting ethical practices and complying with both local and international anti-corruption standards.

Employees and business partners (suppliers, contractors, and subcontractors) must comply with ZCMC's ethical standards and anti-corruption principles, ensuring transparency and integrity throughout the value chain. They are encouraged to report any concerns, conduct, or practices related to corruption.

In the scope of this Policy, the Company is planning to adopt a detailed Anti-Corruption Regulation in 2025, which outlines the prohibition against corruption, including forms such as bribes, kickbacks, facilitation payments, quid pro quo arrangements, clientelism, nepotism, favoritism, sponsorship, revolving doors, and excessive or inappropriate gifts and hospitality. It also outlines the obligations arising from this regulation, as well as the restrictions on gifts and hospitality.

ZCMC actively supports the implementation of the Extractive Industry Transparency Initiative[8] in the Republic of Armenia and complies with the laws and regulations related to anti-corruption and transparency in financial transactions. We transparently report our performance to EITI, which is reflected in our annual reports and is based on EITI standards.

[8] The Extractive Industries Transparency Initiative (EITI) is a global Standard to promote the open and accountable management of natural resources.

Whistleblowing

GRI 2-26

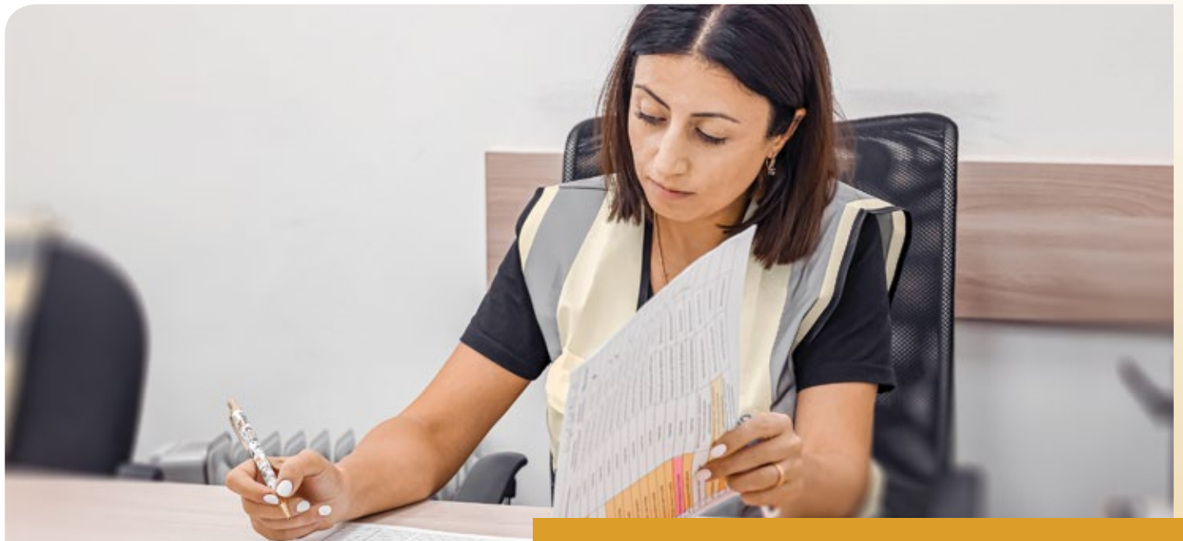
ZCMC has a Whistleblowing Policy that enables employees and stakeholders to report concerns in a confidential manner. According to ZCMC's Code of Conduct, the Compliance Committee, chaired by the Sustainable Development Director, is responsible for reviewing and addressing reported concerns.

The Whistleblowing Policy at ZCMC is designed to address and manage reports of illegal, fraudulent, or corrupt activities, as well as unethical behavior or severe violations of the Company's Code of Conduct, policies, or standards. It also covers conduct that may harm individuals, the environment, the Company, or its reputation. The Policy ensures that the Company's activities comply with the current legislation of the Republic of Armenia, applicable international laws, and the standards they set. It encourages employees to raise concerns about conduct or practices that may pose a threat to ZCMC, its employees, other stakeholders, or the public.

To facilitate this, ZCMC has implemented accessible, secure, and confidential systems for reporting concerns, in line with the drafted Whistleblowing Mechanism. We are is committed to maintaining the confidentiality of the whistleblower's identity, only disclosing it with prior written consent, except in cases required by law or when involving law enforcement is necessary. All materials related to whistleblower reports are kept securely, with access restricted to those involved in the investigation.

ZCMC ensures that whistleblowers are protected from adverse consequences or actions, such as dismissal, demotion, discrimination, harassment, or any other form of retaliation, provided the concerns are raised in good faith. This protection is guaranteed regardless of the outcome of the investigation. The Company plans to provide training to all employees in 2025, familiarizing them with the Whistleblowing Policy and Mechanism and informing them of their rights and responsibilities.

Additionally, ZCMC allocates the necessary resources to implement this Policy effectively and conducts regular reviews and audits to assess its outcomes and identify areas for improvement.



Grievance Mechanism

GRI 2-25

Since the fall of 2024, the Company has been developing a framework of Grievance Mechanisms as a key pillar for addressing social, environmental, and operational concerns. In 2024, ZCMC further strengthened its accountability framework by adopting a formal Grievance Policy. During the reporting period, ZCMC also developed comprehensive Grievance and Whistleblowing Mechanisms to support individuals in raising concerns related to responsible business conduct, ensuring that such issues are addressed in a structured, confidential, and transparent manner. These Mechanisms should provide a secure and confidential platform for employees, stakeholders, and external parties to seek advice on implementing the Company's policies and practices for ethical conduct.

A dedicated Land Damage Grievance Procedure has been developed to address land and property-related issues requiring special attention; however, it was not formally approved during the reporting year. This procedure involves assessing and valuing damages, as well as ensuring the implementation of appropriate and accountable solutions. Through the offered channels, our stakeholders raise concerns about any potential misconduct or violations of the Company's business standards, ensuring that issues can be addressed promptly and effectively.

By applying these Mechanisms, the Company should foster a transparent and accountable work environment, encourage responsible business practices and safeguard against unethical behavior. Mechanisms are planned to be approved by the General Director in 2025.

The Company currently has several mechanisms to provide communication channels for employees, community members, and other stakeholders to express concerns and raise issues. These include the Company's social media pages, an employee grievance hotline, and a dedicated email introduced in 2025, for filing formal (written) community grievances as well as grievance boxes, which have been used since 2023 as part of the broader grievance mechanism.

Grievance Investigation and Monitoring

A dedicated team investigates and monitors grievances. The Company evaluates the investigation outcomes through regular meetings and ongoing oversight to identify potential impacts and develop appropriate mitigation measures. Third independent party is tasked with valuation of land or property damage, to help ZCMC properly handle grievances, for example on land / property damage.

Grievances are raised not only through formal mechanisms but also via various meetings, letters, and social media, revealing areas of improvement in current procedures. That said, all grievances, regardless of communication channels, are being filed electronically and tracked by respective teams. These concerns are reviewed during the development of the Mechanism, with ongoing monitoring and close collaboration with various departments and communities to enhance and improve the process. Once approved, the Grievance Mechanism, like other Company policies, is meant to be publicly shared, ensuring transparency and enabling all stakeholders to provide feedback.

The effectiveness of the Grievance Mechanism in place is assessed through stakeholder input and regular impact evaluations, based on which the Company implements improvements to enhance its responsiveness and accessibility.

Grievances are systematically documented, tracked, and reported in the Company's semi-annual Social Updates. In 2024, a total of 43 grievances were filed — 84% of which (36 cases) were related to land property damage, while the remaining 16 instances concerned health insurance coverage. To ensure a fair resolution, a compensation matrix has been developed to assess the cost of damages on a case-by-case basis and propose an appropriate level of compensation.

No complaints regarding stakeholder or business partner privacy or data loss were reported during the reporting period. All grievances originated from community stakeholders.

Compliance with Laws and Regulations: Ensuring Legal Adherence and Ethical Governance

GRI 2-27, 206-1, 205-3

ZCMC is committed to maintaining fair competition and strictly adheres to applicable anti-trust and competition laws, as outlined in its Code of Conduct. The Company explicitly prohibits any anticompetitive behavior, including price fixing, market manipulation, and monopolistic practices.

During the reporting period:

1. No pending or completed legal actions have been recorded against ZCMC concerning anti-competitive behavior, anti-trust, monopoly practices, or violations of competition laws.
2. There have been no confirmed incidents of corruption, and the Company has not reported any incidents of corruption to the law enforcement authorities of the Republic of Armenia.
3. Few administrative penalties occurred. Details of all administrative penalties imposed in 2024 for violations of applicable laws and policies are presented in Appendix 3.

Digital Transformation Initiative: Shifting to Digital Across Operations

GRI 3-3

9 INDUSTRY, INNOVATION AND INFRASTRUCTURE

The Digital Transformation Initiative is crucial to modernizing the company's operations, enabling it to stay competitive and sustainable in a fast-evolving, technology-driven industry. In the mining sector, digital solutions support safety, efficiency, and cost management, encouraging innovative and resilient practices.

In 2023, the Company launched a comprehensive digital strategy, named after Armenian mathematician Sergey Mergelyan, reflecting its cultural roots and its focus on progress.

The process began with analyzing operational needs and benchmarking ZCMC's digital maturity, guiding a phased plan for transformation. Initially, the Company relied on basic automation and fragmented digital tools, with some core processes dependent on Excel, and an IT infrastructure that was being upgraded for better reliability and scalability.

The new approach integrates data analytics, automation, and real-time monitoring to improve decision-making, equipment reliability, and environmental support. It also enhances safety through early risk detection and monitoring worker exposure, while fostering better collaboration and data sharing across departments.

Beyond technology deployment, the initiative promotes a culture of innovation, agility, and continuous improvement. It aligns with the Company's goals of operational excellence, environmental responsibility, and stakeholder value.

To achieve these aims, ZCMC has organized its digital transformation into five main programs within a comprehensive project portfolio.

Automated Process Control Program

The Automated Process Control Program focuses on modernizing and expanding digital systems across production facilities. The program's primary objectives are to centralize equipment management, enhance data acquisition, improve product quality, and increase equipment reliability. By strengthening automated monitoring and control functions, the program supports higher production efficiency, reduces downtime, and ensures more stable operations.

During the reporting period, the Company implemented several new digital tools to improve real-time process monitoring and decision-making. These upgrades enabled more effective management of material flows, optimized performance of key equipment, and supported better alignment between operational parameters and production goals. Looking ahead, the Company plans to extend these technologies across additional facilities, further improving process reliability and efficiency.

Production Program

The Production Program is a multi-system initiative designed to strengthen operational performance and safety across mining and processing. It includes digital platforms for fleet management, production planning, manufacturing execution, laboratory operations, geological data integration, and pit wall stability monitoring. Together, these systems form a foundation for data-driven decision-making, improved planning accuracy, and more sustainable operations.

In the reporting period, significant progress was made in rolling out core systems. A fleet management solution was introduced to improve real-time allocation of mining equipment, reduce idle time, and enhance safety. A manufacturing execution system was developed to provide end-to-end visibility of production data, thereby bridging the gap between planning and execution. Work also advanced on a new production planning system, designed to optimize both short- and long-term scheduling across the mining value chain.

Other initiatives included the deployment of a laboratory information management system to enhance the efficiency and reliability of quality control processes, as well as the creation of a centralized geological database to improve data consistency and accessibility. Additionally, a pit wall monitoring system was successfully launched to provide early warnings of potential geotechnical risks, thereby enhancing operational safety.

These projects will continue into the next reporting period, with implementation expected to deliver greater operational predictability, improved safety standards, and enhanced asset utilization.

Corporate Processes Program

The Corporate Processes Program focuses on enhancing organizational efficiency through automation and digital transformation. Its scope includes the introduction of an electronic document management system and a modern enterprise resource planning (ERP) platform.

The electronic document management system has enabled a transition to digital workflows, standardizing processes across the document lifecycle while improving compliance and oversight. The ERP system, once fully deployed, will provide a single integrated platform for finance, human resources, procurement, supply chain, and production. It will also strengthen transparency, optimize resource use, and support informed decision-making through advanced reporting and analytics.

During the reporting period, the Company completed initial implementation stages for both systems, including assessments, configuration, and process mapping. Rollout will continue in phases to ensure smooth adoption and alignment with business transformation goals.

Security Program

The Security Program is designed to modernize facility protection and occupational safety systems. It includes enhancements to access control, fire detection and prevention, as well as emergency response. The program also aims to strengthen compliance monitoring and integrate digital solutions for time management and workforce safety.

During the reporting period, assessments were conducted across facilities, and the first phase of modernization was initiated. Planned next steps include further deployment of access control and fire protection systems, alongside expanded emergency preparedness capabilities.

IT Infrastructure Program

The IT Infrastructure Program provides the backbone for the Company's digital transformation. It focuses on expanding data center capacity, strengthening system resilience, and ensuring robust information security. The program also establishes scalable architecture that is capable of supporting both capable of supporting current and future digital initiatives.

In the reporting period, the Company enhanced its IT monitoring capabilities and introduced secure platforms for managing sensitive information. Future work will include commissioning new data centers and migrating key business systems to these facilities, ensuring fault-tolerant operations and advanced protection against cyber threats.

ZCMC's People: Drivers of Sustainable Success

59 — Compliance and Personal Management: Aligning with Global Standards
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GRI 3-3

Compliance and Personal Management: Aligning with Global Standards

People are at the heart of our operations and the driving force behind our achievements. We believe that a well-trained, motivated, and committed workforce fuels our Company's sustainable growth. Each recruitment and development decision is considered a strategic investment in ZCMC's long-term success.

In line with this philosophy, we are committed to fostering a culture of continuous learning, professional development, and teamwork. We invest in regular training programs to enhance our employees' skills and knowledge, empowering them to advance personally and professionally. Furthermore, we strive to foster an inclusive and collaborative work environment where every employee feels valued, respected, and aligned with the Company's mission.

Approximately 90 percent of our workforce originates from the Syunik Marz community. By investing in human capital, we are also contributing to the social development of these communities. Strategic talent management is an integral part of our social policy, ensuring continuous growth and development opportunities for our workforce, and thereby for our communities.

In its human capital management, our Company ensures adherence to the laws of the Republic of Armenia, such as the RA Labor Code.

90%

of our workforce originates from the communities of Syunik Marz

Following the successful restructuring of its Personnel Management Division into the Human Resources Management Division in 2023, ZCMC continued its organizational transformation in 2024. ZCMC actively followed global best practices across multiple functions in 2024, driving continued improvements in efficiency, transparency, and overall performance.

In 2024, ZCMC adopted several key human capital policies, including:

1. Local Employment Policy
2. Human Rights Policy
3. Policy Against Workplace Violence, Harassment, Discrimination, and Retaliation.

Local Employment Strategy: Driving Economic Growth and Community Development

To foster local economic growth and community development, our Company provides direct, indirect, and incentivized employment opportunities across all communities affected by its activities. The Local Employment Policy underscores ZCMC's commitment to prioritizing the hiring and development of local talent, thereby contributing to regional advancement and community well-being.

ZCMC maintains a database of local candidates detailing their skills and experience to support local recruitment. The company plans to provide targeted training programs for community members, particularly youth and vulnerable groups, to help them acquire the qualifications necessary for available roles. ZCMC is committed to promoting equal employment opportunities without discrimination and allocates resources to sustain local employment initiatives. Through these efforts, the Company reinforces its role as a key contributor to regional economic resilience and sustainable growth.

Company regularly monitors and discusses its local employment impact with stakeholders, valuing transparency and community feedback.

Employee Rights: Ensuring Non-Discrimination and Supporting Collective Bargaining

The Human Rights Policy and Policy Against Workplace Violence, Harassment, Discrimination, and Retaliation places a strong emphasis on the principles of non-discrimination and the right to collective bargaining.

Workplace Conduct: Freedom of Association and Collective Bargaining

GRI 3-3, SASB EM-MM-210b.2., EM-MM-310a.1.

ZCMC fully acknowledges and respects its employees' right to freely form, join, or refrain from joining trade unions and their right to engage in collective bargaining in accordance with applicable local laws. The Company ensures that employees can exercise these rights without fear of retaliation, intimidation, or harassment. ZCMC remains committed to maintaining open communication and constructive social partnership with the Trade Union representing its workforce.

GRI 2-30

In 2024, 99%[9] of our workforce continued to be members of the Trade Union, which plays a central role in representing employees' rights and facilitating collective bargaining. As a result of this stable and collaborative labor environment, there were no site shutdowns or project delays due to non-technical factors in 2024.

While ZCMC's ongoing engagement efforts have consistently fostered positive labor relations, in early 2025, during the preparation of this report, a group of employees initiated an unauthorized strike, demanding a 50% salary increase. The action, which was neither sanctioned by the Trade Union nor conducted

[9] Working conditions of other employees are also based on the Company's collective bargaining agreement.

through lawful procedures, resulted in a temporary 11-day suspension of operations due to the involvement of about a hundred employees and community members. Notably, no force was employed by the Company or law enforcement authorities during this period. The situation was resolved through extensive negotiations with the protest leaders, facilitated by top management, and following a public appeal by the General Director to end the unauthorized action. The Company estimates a financial loss of approximately USD 1 million per day of halted operations, along with an additional USD 300,000 in foregone tax contributions.

This incident highlights the need to strengthen our employee engagement strategies, improve awareness of lawful collective action, and enhance communication between workers, the Trade Union, and the Company leadership.

Looking ahead, ZCMC remains focused on promoting inclusive and transparent collective bargaining processes. We will continue to refine our negotiation framework, support the role of employee representatives, and cultivate a cooperative and respectful work environment in line with our corporate values and legal obligations.

Workplace Conduct: Non-Discrimination and Violence Prevention

GRI 3-3

We are committed to cultivating a workplace environment that is safe, respectful, and inclusive for all employees. A cornerstone of this commitment is our zero-tolerance policy toward discrimination and workplace violence. We uphold the principle of non-discrimination by ensuring that no employee or individual associated with our operations is treated unfairly based on gender, race, ethnicity, religion, sexual orientation, disability, age, or any other personal characteristic.

We actively promote equal opportunities and merit-based decisions across all levels of our Company. We also take a zero-tolerance stance on any form of workplace violence, harassment, or retaliation. This includes safeguarding employees from intimidation, threats, or any behavior that could create a hostile work environment.

Our policies apply to employees, contractors, vendors, and all third parties engaged in our operations, ensuring consistent protection across our entire business ecosystem. All reports of discrimination, violence, or harassment are treated with the utmost seriousness, investigated thoroughly, and addressed promptly to uphold a safe, respectful, and inclusive workplace culture.

To ensure proper channels for reporting and whistleblowing, at the beginning of 2025 — we have provided several communication platforms for the employees, which are regularly monitored and acted upon. These include a hotline, an email, and a special complaint form on the website. Grievance boxes are placed in the administrative building of the Company in Kajaran as of 2023 and employees can also place their letters in the boxes, anonymously if so desired.

Through ongoing training, awareness, and strict enforcement of our policies, ZCMC strives to create an environment where all individuals feel valued, secure, and empowered to contribute their best.

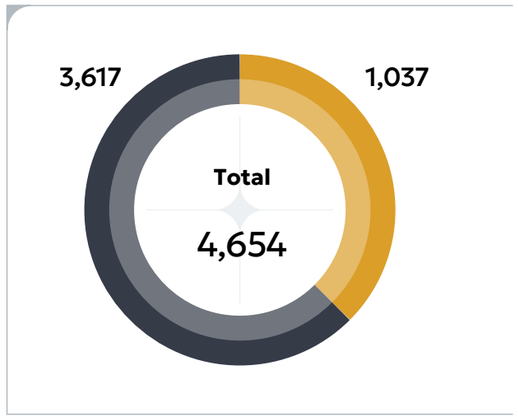
GRI 406-1

In 2024, ZCMC recorded no reported cases of discrimination, whether based on race, color, gender, religion, political beliefs, national origin, social background, or any other grounds as defined by the International Labour Organization (ILO), affecting internal or external stakeholders. This outcome reflects the continuation of a positive track record maintained over the past four years.

Human Capital Dynamics: Promoting Workforce Stability and Local Engagement

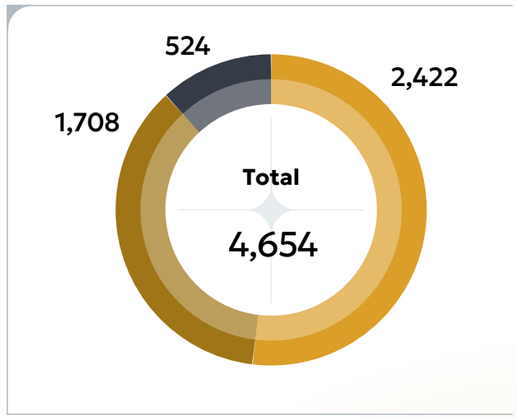
GRI 2-7

Total employees breakdown by gender



Male Female

Total employees breakdown by region



Kajaran Kapan Other

Detailed information on the total number of employees, including breakdowns by employment type, gender, and region, is presented in Appendix 3.

As of the end of 2024, ZCMC employed a total of 4,654 individuals. Men comprised 77.72% (3,617 employees) of the workforce, while women accounted for 22.28% (1,037 employees). This level of gender balance[10] exceeds the industry average, reflecting the results of continuous investment in the local workforce. This investment guarantees the empowerment of women in our local communities, as the majority of our workforce, including women, comes from these communities. The increased representation of women reflects our ongoing commitment to promoting inclusive employment and advancing gender diversity within the sector. Around 40 women hold management positions.

[10] As of 2024, women comprise approximately 15% of the global mining workforce. Source: Women in Mining UK, 100 Global Inspirational Women in Mining 2024

ZCMC continues to play a vital role in local economic development, with 88.74% of its workforce — 4,130 employees — hired from the neighboring communities of Kajaran and Kapan. This strong local representation underscores our long-standing commitment to creating sustainable employment opportunities in our operating regions. This commitment was further reinforced through the approval of ZCMC's Local Employment Policy in 2024, which formalizes our approach to prioritizing local talent.

GRI 401-1, 402-1

In 2024, ZCMC welcomed 216 new employees, representing 4.64% of the total workforce. The figures in the table underscore our commitment to enriching the diversity of our workforce by engaging a younger workforce and recruiting from both local communities and beyond.

New hires

Indicator	2023	2024
By gender		
Men	259	**167**
Women	76	**49**
By age group		
Under 30 years old	105	**71**
30-50 years old	181	**117**
Over 50 years old	49	**28**
By region		
Local (Kajaran and Kapan communities)	256	**160**
From other regions of the RA and abroad	79	**56**
Total new hires	**335**	**216**

While talent acquisition remains a key priority, ZCMC strongly emphasizes employee retention.

In 2024, our employee turnover rate decreased to

4.89%

(228 employees)

improving from

5.53%

(256 employees) in 2023

This positive trend indicates strong employee engagement, job satisfaction, and organizational stability.

Managing employee turnover remains a strategic priority for ZCMC. It directly affects operational continuity, workforce stability, and long-term organizational performance. Accordingly, the Company actively monitors turnover trends and implements targeted initiatives to strengthen employee retention and engagement at all levels of the Company.

The turnover rate for female employees decreased from 6.1% in 2023 to 3.66% in 2024. The turnover rate among men remained relatively stable. The highest turnover rate, 11.9%, was recorded among employees over 50, primarily due to retirement.

From a geographic perspective, the turnover rate among local employees (Kajaran and Kapan) was 4.26%, whereas employees from other regions of Armenia and abroad experienced a significantly higher turnover rate of 9.92%.

Understanding these workforce dynamics is essential for shaping ZCMC's long-term human resources strategy. The Company is actively leveraging these insights to strengthen employee retention efforts, focusing on knowledge transfer from retiring employees, generational succession planning, and expanding career development opportunities within local communities.

In 2024, the turnover rate among female employees decreased to

3.66%

compared to

6.1% in 2023

Turnover

Category	2023	2024
By gender		
Male	5.30%	**5.25%**
Female	6.10%	**3.66%**
By age group		
Under 30 years old	2.70%	**3.46%**
30-50 years old	1.90%	**2.43%**
Over 50 years old	15.90%	**11.91%**
By region		
Kajaran and Kapan	4.60%	**4.26%**
Other	12.00%	**9.92%**
Total	**5.53%**	**4.89%**

Steering the Vision: Our Senior Management Team

GRI 202-2

ZCMC's senior management team comprises 14 professionals who collectively guide the Company's strategic direction and operational excellence. This group encompasses all leadership roles from the General Director to Directors.

Reflecting the scale of our operations and our commitment to embedding leadership within the local[11] context, the geographic distribution of senior management is as follows: 1 employee is based in Kajaran, 11 in other regions of Armenia, and 2 are located internationally.

When recruiting new employees for senior leadership positions, ZCMC prioritizes candidates who demonstrate a strong alignment with the local economic, social, and cultural context. We actively invest in the development of local talent by supporting regional universities, with a particular focus on Syunik Marz, to help cultivate the next generation of leaders and technical experts.

GRI 405-1

Diversity of governance bodies and employees

	2023						2024					
Indicator	**Men**	**Women**	**Under 30 years old**	**30-50**	**Over 50 years old**	**Total**	**Men**	**Women**	**Under 30 years old**	**30-50**	**Over 50 years old**	**Total**
Board of Directors	6	1	-	3	4	7	**6**	**1**	**0**	**2**	**5**	**7**
Executive management[12]	15	0	0	12	3	15	**14**	**0**	**0**	**10**	**4**	**14**
Laborers	3,625	1,026	603	2,885	1,163	4,651	**3,603**	**1,037**	**578**	**2,916**	**1,146**	**4,640**
Total employees	**3,640**	**1,026**	**603**	**2,897**	**1,166**	**4,666**	**3,617**	**1,037**	**578**	**2,926**	**1,150**	**4,654**

[11] ZCMC defines "local" as the towns of Kajaran and Kapan in the Republic of Armenia, where the Company's core operational activities are concentrated. These locations are also considered our significant areas of operation.

[12] In the 2023 Report, the number of Executive management included the General Director, Deputy General Directors, Directors of Directorates, and their deputies. In the 2024 Report, the number includes the General Director, Deputy General Directors, and Directors of Directorates. The 2023 figures have been restated accordingly for consistency.

Engaging External Expertise: Partnering with Non-Staff Professionals

GRI 2-8, SASB EM-MM-000.B

In 2024, ZCMC engaged 38 non-employees under direct service contracts.

These individuals primarily served as consultants, providing translation services and specialized expertise in administration, legal affairs, and business consulting. Integrated into the operations of relevant departments, these experts enabled the Company to effectively leverage external knowledge and skills to support and enhance internal capabilities.

The number of non-employees remained relatively stable throughout the reporting periods, with no significant fluctuations. This consistency reflects ZCMC's steady operational demands and the ongoing need for specialized external support through established contractual relationships.

Skill Enhancement: Committing to Workforce Growth

GRI 404-1

Following the establishment of our dedicated Training Centre in 2023 under the supervision of the Administrative Department, we substantially broadened the scale and impact of our training programs in 2024.

In 2024, ZCMC organized 542 training sessions, encompassing a wide range of formats and expertise areas. The total duration of training sessions at ZCMC reached 1,656 hours, engaging 3,491 participants across all departments and employee categories. Of these, 619 were women and 2,872 were men, demonstrating ZCMC's inclusive approach to professional development. This high level of participation underscores the Company's ongoing commitment to continuous learning, skill enhancement, and development of workforce capabilities.

Employees and contractors

Indicator	Unit of measurement	2023	2024
Total employment[13]	people	5,268	**7,554**
Number of contractors[14]	people	602	**2,900[15]**
Percentage of contractors	%	11.43	**38.4**

[13] This indicator comprises both own workers of ZCMC and contractors.

[14] The number of contractors is compiled based on actual head counts, which ensures precise and verifiable data. Data is reported as observed at the end of the reporting period, providing a definitive snapshot of non-employee engagement at a specific time.

[15] The increase in the number of contractor employees covered by ZCMC's Occupational Health and Safety Management System is attributed to the addition of one contractor company, with which ZCMC established contractual relations during the reporting period.

Training in 2024 (by gender)

	2023			2024		
Gender	**People**	**Total hours**	**Average hours**	**People**	**Total hours**	**Average hours**
Male employees	3,640	9,100	2.5	**2,872**	**1,374**	**0.48**
Female employees	1,026	2,565	2.5	**619**	**282**	**0.46**
Total employees	**4,666**	**11,665**	**2.5**	**3,491**	**1,656**	**0.47**

In 2024, the average training hours per employee at ZCMC decreased compared to 2.5 hours in 2023. This reduction is primarily due to the completion of several large-scale mandatory informational and certification training sessions conducted in 2023, each ranging from 1 to 4 hours. These sessions covered essential topics such as first aid, handling explosive devices, and electrical safety.

Average hours on training per employee

0.47 [16]

[16] Excluding health and safety related trainings.

Training implemented in 2024 (by type)

Training type	Sessions	Duration (hours)	Participants
Mandatory training	23	31	417
Information briefing/Induction	31	40	893
Occupational training	124	593	176
Technical skills training	180	568	266
Soft skills training	55	180	262
Certification training	58	107	870
Pre-certification training	71	137	607
Total	**542**	**1,656**	**3,491**

GRI 404-2

In 2024, our training programs covered a broad spectrum of topics to strengthen essential operational skills and leadership development.

Key initiatives included:

- **Mandatory trainings** — induction, familiarization with certification processes, certification and pre-certification training, first aid, general safety protocols and other mandatory safety certification.
- **Information briefing/Induction** — featured awareness of Environmental matters, civil defense and other related.
- **Technical and professional skills training**
- **Soft skills development**

ZCMC maintains a strategic and structured approach to workforce development, supported by a comprehensive suite of training programs tailored to the evolving needs of its operations. In 2024, these initiatives remained focused on strengthening the capabilities of key employee segments, including field personnel, engineering teams, and mid-level management. The training curriculum encompassed mandatory safety and compliance modules, technical skill enhancement, and soft skills development, ensuring alignment with operational requirements and the Company's core values. Targeted programs, such as those designed for heavy machinery operators and millers, combined theoretical instruction with practical application to reinforce safety protocols and enhance operational efficiency. Pre-certification modules and competency evaluations were employed to assess readiness and uphold high-performance standards across the workforce.

Feedback mechanisms, led by line managers and systematically analyzed by the Training Centre, were critical for ongoing program refinement, reinforcing the Company's commitment to continuous improvement and long-term human capital development.

Performance and career development reviews

GRI 404-3

In 2024, ZCMC reaffirmed its focus on employee growth by implementing a structured system for regular performance and career development reviews.

This initiative, coordinated by the Training Centre, aligns individual performance with organizational goals and supports long-term career progression across all departments. The process involves formal verification of an employee's competencies relevant to their job responsibilities, with a primary focus on professional skills. In addition, a comprehensive evaluation assesses personal attributes, motivation, and career aspirations. These attestations are conducted annually and are a key component of ZCMC's structured employee development approach.

During the reporting year, performance and development reviews were conducted for a targeted workforce segment, primarily focusing on operational roles. The distribution of employees receiving performance reviews in 2024 reflected the overall gender composition of the Company. Specifically, 17% of the reviewed employees were women, while 83% were men, closely mirroring ZCMC's workforce demographics. The detailed distribution of employees receiving reviews is as follows:

Performance and development reviews

Employee category	Percentage of employees reviewed
Riggers	12%
Employees working with equipment under pressure	8%
Crane operators	4%
Conveyor operators	3.50%
Mine fleet drivers	7%

This initial implementation phase reflects our targeted approach, prioritizing high-risk and operationally critical roles. As the system evolves, we aim to expand its reach encompass all employee categories, ensuring fair and consistent development opportunities for all employees, regardless of role or gender.

ZCMC considers performance reviews a critical mechanism for acknowledging employee achievements, identifying development opportunities, and aligning individual aspirations with organizational goals. This process enhances workforce capability and helps drive ZCMC's strategic objectives by fostering a culture of accountability, development, and continuous improvement.

Compensation and Benefits: Enhancing Employee Well-being

GRI 3-3, 401-2

We continue to prioritize the well-being and safety of our workforce. We recognize that a comprehensive and well-structured benefits package is crucial to attracting and retaining top talent.

Comprehensive Benefits for Employees

ZCMC offers its full-time employees a range of standard benefits[17], designed to ensure security, health, and a high quality of life.

Health insurance

ZCMC continues to provide comprehensive health insurance coverage for its employees and their family members, offering peace of mind and financial support for a wide range of healthcare needs.

Healthcare services

Beyond insurance coverage, healthcare services not included under the standard plan are funded separately by ZCMC Charitable Foundation. This ensures that employees and their families can access essential medical care without financial hardship.

Disability and invalidity coverage

While disability and invalidity benefits are primarily administered through state mechanisms, ZCMC provides additional support in the event of on-site incidents, further reinforcing our commitment to employee safety and well-being.

Free meals

ZCMC continues to provide free meals during work hours at our canteen facilities. Employees working in specific zones or on various shifts receive meals at their worksite, ensuring proper nourishment and support throughout their shifts.

Parental leave and retirement provisions

are governed by the Labor Code of the RA, and all employees are entitled to parental leave and retirement benefits as stipulated.

[17] These benefits are not extended to part-time or temporary employees and are specifically applied in our principal locations of operation Kajaran and Kapan, Armenia.

We remain committed to regularly reviewing and enhancing our benefits package to ensure alignment with employee feedback, organizational values, and evolving regulatory standards. Our focus is on supporting the holistic well-being of our employees, which we view as essential to the long-term success of our operations and the positive impact we strive to make within our communities.

GRI 401-3

Parental leave

	2023			2024		
Parental leave	**Men**	**Women**	**Total**	**Men**	**Women**	**Total**
Number of employees entitled to maternity or childcare leave (according to the RA Labor Code)	3,640	1,026	**4,666**	3,617	1,037	**4,654**
Number of employees who took maternity and parental leave	1	53	**54**	1	57	**58**
Number of employees who returned to work at the end of the leave	-	8	**8**	1	29	**30**
Number of employees who returned to work in the previous year at the end of maternity/ paternity leave and were still working after 12 months	-	8	**8**	0	7	**7**
Return to work rate (%)	**-**	**15.09**	**14.81**	**-**	**50.88**	**51.72**
Retention rate (%)	**-**	**100**	**100**	**--**	**24.14**	**23.33**

Commitment to Fair Compensation

GRI 202-1, 405-2

According to the Human Rights Policy, ZCMC is dedicated to ensuring that all employees are compensated in accordance with the law and competitively negotiated employment agreements and that their working hours comply with applicable legal requirements[18] and international standards.

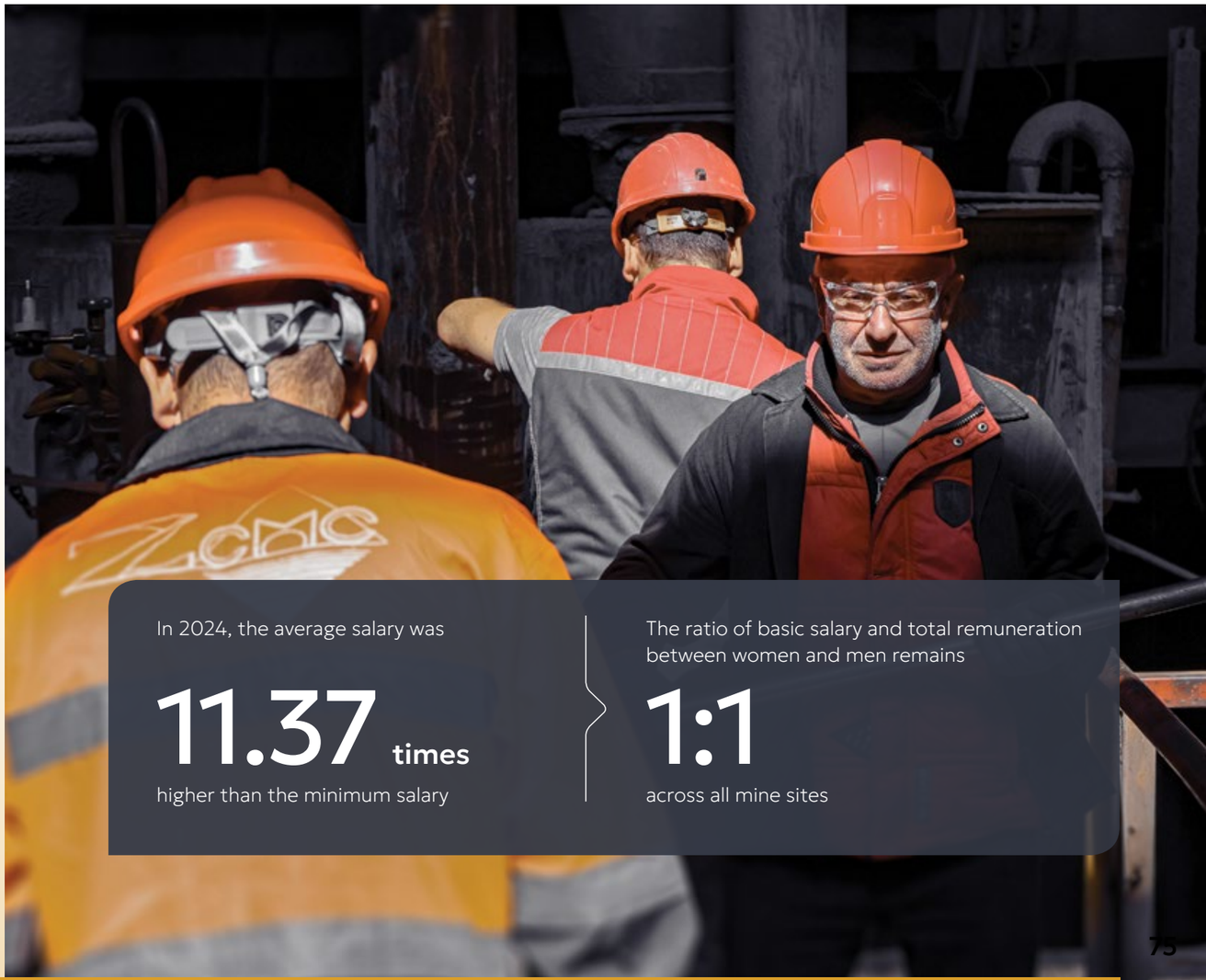
We ensure that all employees receive a monthly gross salary that exceeds the minimum wage[19] stipulated by the Republic of Armenia's labor legislation. In 2024, the average wage was 11.37 times higher than the minimum salary [specific design needed]. The approach underscores our dedication to fair labor practices and the overall well-being of our workforce. This standard is applied uniformly across our principal locations of operation in Kajaran and Kapan.

In 2024, our commitment to gender equality continued to be reflected in our compensation structure. The ratio of basic salary and total remuneration between women and men remains 1:1 [specific design needed] across all mine sites.

This demonstrates our ongoing adherence to equal pay for equal work, irrespective of gender or other diversity indicators.

Gender equality and equal pay are embedded into all aspects of our operations and are monitored through internal audits and regular reviews of employment contracts and payroll systems.

By maintaining a fair, inclusive, and transparent compensation system, ZCMC fosters a culture of equality and respect while reinforcing its reputation as an employer of choice. These efforts contribute to developing a motivated, loyal, and diverse workforce, key to our long-term success and the sustainability of our operations.



In 2024, the average salary was

11.37 times

higher than the minimum salary

The ratio of basic salary and total remuneration between women and men remains

1:1

across all mine sites

[18] Including applicable collective agreements.
[19] The minimum salary in Armenia in 2024 was set at AMD 75,000.

Advancing Organizational Wellbeing and Resilience Through Adopting a Strong Occupational Health and Safety Culture

81 — Comprehensive Risk Assessment and Safety Management: Enhancing Proactive Protection and Workplace Safety
88 — Strengthening Workplace Safety: Ensuring Access to Quality Occupational Health Services for Hazard Prevention and Risk Reduction
89 — Comprehensive Health and Safety Training: Building a Safer Workplace Through Targeted Education and Awareness
92 — Comprehensive Health and Safety Support: Ensuring Well-being Through Access to Medical Services

GRI 3-3, 403-1, 403-7

The Occupational Health and Safety (OHS) management system is a cornerstone of ZCMC's commitment to maintaining a safe and healthy working environment. This system is implemented in full compliance with applicable legal requirements, ensuring alignment with local regulations and international occupational health and safety standards.

The following legal frameworks guide the system:

- The Law of the Republic of Armenia "On the State Regulation of Technical Safety";
- Decision of the RA Government "On Approval of Safety Rules for Blasting Works";
- Decision of the RA Government "On Determining Technical Safety Rules for Safe Operation of Open-Clean Mineral Mines";
- Decision of the RA Government "On Approval of Safety Rules during Certain Blasting Works";
- Decision of the RA Government "On Approval of Technical Regulations Safety Rules for Crushing, Sorting, and Enrichment of Useful Minerals»;
- Order of the Ministry of Health of RA "On Approval of Sanitary Norms in Workplaces";
- Decision of the RA Government "On Approval of Technical Regulations of Safe Operation Rules for Working with Electrical Equipment".

These legal frameworks and regulations require a robust OHS management system, which includes, but is not limited to, the above-mentioned list.

Beyond meeting legal requirements, ZCMC's OHS management system is built upon internationally recognized standards and guidelines, ensuring alignment with global best practices in risk management.

The following standards and guidelines served as the foundation for the design and execution of the OHS management system:

OHSAS 18001:2007

is an established framework within the Company for managing occupational health and safety, focusing primarily on risk management, hazard control, and legal compliance. It is designed to help organizations address workplace health and safety risks rather than product safety. As ZCMC initially began formalizing its approach to OHS management, it adopted OHSAS 18001 as the foundational standard.

ISO 45001:2018

which replaced OHSAS 18001, is now the international benchmark for OHS management systems. It builds on the principles of OHSAS 18001, but introduces a more proactive, risk-based approach and is aligned with other ISO management system standards (such as ISO 9001 and ISO 14001). Recognizing the shift toward this improved framework, ZCMC transitioned from OHSAS 18001 to ISO 45001, ensuring continued alignment with global best practices and integrated management standards. This transition reflects the Company's commitment to continuously improving workplace safety and health performance.

ZCMC obtained certification for its OHS management system under ISO 45001 in 2022 from an accredited organization. It is audited on an annual basis to ensure the accurate implementation of the standard requirements.

ILO-OSH 2001 guidelines

A set of international guidelines developed by the International Labour Organization to assist organizations in establishing effective occupational health and safety management systems. These guidelines promote a preventative safety and health culture and provide a flexible framework that can be adapted to the organizational contexts, supporting continual improvement in workplace health and safety performance.

These standards and guidelines are widely recognized, ensuring that the OHS management system is comprehensive, practical, and focused on preventing risks and promoting continuous improvement.

The Scope of the OHS Management System

GRI 403-8

The scope of the OHS management system extends across all dimensions of ZCMC's operations, ensuring a holistic and integrated approach to workplace safety and health. It applies to all categories of workers involved in the Company's activities, regardless of their employment status or function. This includes full-time and part-time employees, temporary staff, contractors, and subcontractors — spanning every level of responsibility, from operational personnel on the ground to executive leadership.

The system encompasses the full range of organizational activities that present occupational health and safety risks. These include, but are not limited to, construction and infrastructure works, the maintenance and operation of light and heavy machinery, equipment servicing and repair, internal transportation and logistics, and various administrative functions. Each operational domain is subject to the same health and safety principles defined under the OHS framework.

Regarding physical coverage, the system is implemented across all sites where the Company conducts its activities. This includes the TSF, tailing delivery system, Geghi water reservoir, open-pit mine with associated infrastructure, processing facilities, ore crushing and transportation workshops, maintenance zones, warehouses, storage units, and administrative offices. It also extends to specialized spaces, such as the Sewing Workshop, the Sports and Health Complex, and designated contractor zones. All operational environments under the Company's control are integrated into the OHS management system to ensure a uniform application of safety protocols and ongoing risk management.

This comprehensive approach enables ZCMC to go beyond mere legal compliance, aligning its practices with international standards and fostering a culture of safety, accountability, and continuous improvement throughout its operations.

Employees and contractors

	2023		2024	
Indicator	**People**	**% of the total number of employees**	**People**	**% of the total number of employees**
Number of people covered by ZCMC's OHS management system	4,487	96.2%	**4,654**	**100%**
Number of people covered by ZCMC's OHS management system that passed the internal audit procedure	≈3,634	≈78%	**4,654**	**100%**

Number of non-employees (contractors) of ZCMC covered by the OHS management system

	2023		2024	
Indicator	**People**	**% of the total number of employees**	**People**	**% of the total number of employees**
Number of non-employees (contractors) covered by ZCMC's OHS management system	≈602	≈100%	**2,900**	**≈100%**
Number of non-employees (contractors) covered by ZCMC's OHS management system that have undergone an internal audit procedure	≈602	≈100%	**2,900**	**≈100%**

Comprehensive Risk Assessment and Safety Management: Enhancing Proactive Protection and Workplace Safety

GRI 3-3, 403-2

ZCMC applies a structured Plan-Do-Check-Act (PDCA) approach to the ongoing development of its OHS management system. This iterative approach enables ZCMC to continuously enhance workplace safety, reduce risks, and foster a proactive safety culture throughout the Company.

Plan

The Company identifies potential health and safety risks and sets measurable objectives and targets to reduce workplace incidents and enhance the overall safety culture. Planning also includes the development of policies, procedures, and risk control strategies in accordance with applicable legal and regulatory requirements.

Do

ZCMC implements the planned measures by integrating safety procedures into daily operations, conducting training sessions, and raising employee awareness. The Company ensures that responsibilities are clearly assigned and that safety controls are effectively implemented across all departments.

Check

Through regular inspections, audits, and incident investigations, ZCMC monitors the effectiveness of its OHS initiatives. Performance indicators and compliance metrics are reviewed to assess whether objectives are being met and identify any potential gaps.

Act

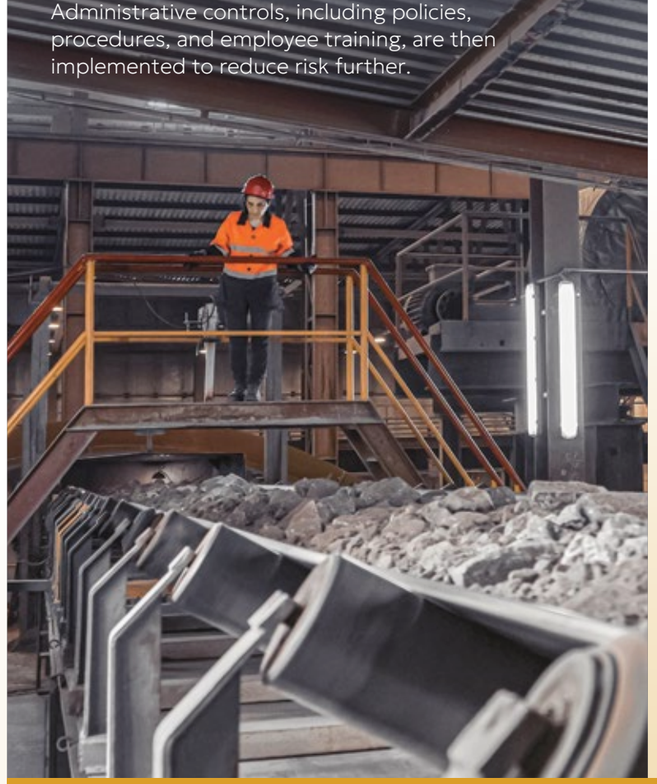
Based on monitoring results, the Company initiates corrective and preventive actions to address any identified shortcomings or emerging risks. Lessons learned from incidents and audits inform the next planning phase, ensuring that the system evolves in response to changing conditions and new insights.

Within the framework of the risk assessment and hazard identification procedure, ZCMC has carried out hazard identification and risk assessment for both routine and non-routine activities. Meanwhile, regular safety audits, inspections, and observations are implemented to identify potential hazards associated with daily work activities. These processes include scheduled checklists, inspection reports, and hazard and risk reports by designated safety personnel. Non-routine assessments identify hazards arising from irregular or temporary activities, such as special projects, new equipment, or one-time tasks. Risk assessments are conducted before such tasks begin, considering new hazards that might emerge from unfamiliar conditions, tools, or procedures.

In ZCMC, work-related hazards that pose a risk of high-consequence injury include:

- Injury risks from unprotected machinery, including conveyor belts, presses, and other moving parts, are particularly high when lockout/tagout protocols are not adequately implemented.
- The danger of limb entrapment or crush from equipment with exposed or moving components.
- Life-threatening hazards from high-voltage electricity are particularly prevalent in electrical work, construction, and maintenance operations.
- Significant risk of severe injury or fatality when working at heights.
- Health and safety risks in confined spaces, such as tanks, tunnels, or silos, may include toxic gases, low oxygen levels, or entrapment hazards.

ZCMC applies the hierarchy of controls as a structured and proactive approach to managing workplace hazards, beginning with eliminating risks wherever feasible. The Company is actively working to eradicate high-risk tasks and processes, such as those involving hazardous chemicals or operations that pose significant health risks. When elimination is impossible, ZCMC prioritizes substitution — replacing hazardous materials, processes, or equipment with less dangerous alternatives. Through physical workplace modifications, engineering controls are then implemented to isolate workers from potential hazards. For example, in workshops where noise levels exceed 80 dB, ZCMC has installed specialized enclosures for employees to monitor the process and reduce their noise exposure. Additional engineering measures, such as safety barriers, guards, and shields, are used around machinery with moving parts to prevent accidental contact and injury. Administrative controls, including policies, procedures, and employee training, are then implemented to reduce risk further.



Targeted training, formal certification, and regular performance evaluations maintain the competency of individuals responsible for conducting risk assessments. Safety officers and other key personnel are typically required to hold recognized occupational health and safety qualifications and participate in continuous professional development programs to stay current with best practices and regulatory changes.

To ensure the effectiveness of hazard identification and risk assessment processes, ZCMC employs a multi-layered oversight system that includes peer reviews, management evaluations, and both internal and external audits. These safety audits and inspections play a vital role in maintaining quality control and verifying the proper application of assessment methods.

The Company management routinely reviews findings from hazard identification and risk assessments. This feedback loop allows ZCMC to identify trends, detect gaps, and target areas for improvement within the OHS management system. Regular safety meetings and reporting mechanisms support the continuous review and adjustment of safety protocols and procedures.

Work-Related Illnesses

GRI 403-9,430

No work-related illnesses or fatalities were caused by exposure to hazardous in 2024.

Unfortunately, 2024 was marked by a fatal incident, underscoring the ongoing challenges of fully embedding a strong safety culture across the Company. The incident, described in detail in the following sections, emphasizes the need for ongoing and intensified efforts to enhance safety awareness and practices at all levels. We acknowledge that building a deeply rooted safety culture remains a work in progress, and we are committed to ensuring it becomes an integral part of daily operations and decision-making throughout the Company[20].

As a large-scale mining operation, the Company exposes its workforce to various occupational hazards that can pose significant risks to employee health. These include:

- Physical hazards such as excessive noise, vibration, extreme temperatures (both high and low), slips, trips, falls, and radiation exposure.
- Chemical hazards involving toxic substances, dust, fumes, vapors, and various chemicals used or generated during operations.
- Mechanical hazards from moving machinery and rotating equipment parts.
- Workplace environment hazards include inadequate ventilation, poor housekeeping, limited working space, and confined areas.
- There are also psychosocial risks, including chronic stress, fatigue due to long shifts, insufficient rest breaks, and high workloads.

[20] No fatalities were recorded in 2024 among ZCMC non-employees.

Worker Engagement and the Right to a Safe Workplace

GRI 403-4

At ZCMC, workers are actively encouraged to participate in maintaining a safe work environment by reporting hazards through multiple accessible channels. These include a physical suggestion box, direct communication with supervisors or safety officers, and, where necessary, anonymous reporting options. All reporting mechanisms are designed to be simple, confidential, and always available, including outside of regular working hours.

Clear instructions on how to report hazards are prominently displayed and regularly communicated. This information is communicated through multiple channels , including noticeboards, internet portals, and safety briefings. The Company utilizes various platforms , including meetings, digital platforms, and printed materials — to communicate updates and changes in health and safety protocols. These methods ensure that all workers, including those not directly employed by the Company, are informed about safety risks and measures.

To foster a culture of trust and transparency, the Company upholds a Policy against workplace violence, harassment, discrimination and retaliation. This Policy ensures that all employees can report unsafe conditions without fear of disciplinary action, termination, or any form of retaliation. All personal information related to hazard reporting is treated with strict confidentiality, reinforcing worker protection and encouraging proactive engagement.

The Company places the highest value on human life and health, which is reflected in its policies and practices. Employees are clearly informed of their right to stop work if they believe that continuing may result in injury or illness. This right is embedded in the Company's Health and Safety procedures and reinforced through regular communication channels , including inductions, safety briefings, training sessions, posters, and team meetings.

When employees exercise this right, they are expected to immediately report the situation to their supervisor or a designated safety officer. The Company treats such reports with urgency, initiating thorough investigations to assess the risk and implement appropriate corrective actions. Employees who withdraw from dangerous situations are fully protected, with assurance of job security and immunity from any disciplinary action for prioritizing their safety.

Daily inspections serve as a key mechanism for worker participation in the OHS management system, allowing employees to provide feedback on health and safety matters. Based on these inspections, weekly presentations are prepared for the Company's top management, ensuring they are aware of ongoing health and safety issues and that appropriate measures are being implemented to resolve them within a specified timeframe.

Accident and Incident Investigations

ZCMC considers the investigation of accidents and incidents a vital element of its ongoing efforts to maintain a safe workplace. The Company views such investigations as a key tool for identifying root causes, avoiding future incidents, and strengthening overall safety procedures.

Guided by an established procedure that outlines the standards for reporting and investigating accidents, ZCMC identifies and implements corrective actions aimed at eliminating risks and enhancing its safety performance.

To support this process, as it was mentioned in the 2023 Report, we apply the Incident Cause Analysis Method (ICAM) — a structured methodology designed to uncover the underlying causes of incidents, rather than focusing solely on immediate or visible outcomes. ICAM enables a comprehensive review of contributing factors, including human error, systemic failures, and the sequence of events leading up to an incident. This deeper analysis provides the Company with the insight needed to address broader organizational weaknesses.

Using ICAM, ZCMC ensures its investigations lead to meaningful conclusions and practical corrective actions, which help prevent recurrence and support the continuous improvement of its OHS system.

Strengthening Control Measures

As outlined in the 2023 Sustainability Report, ZCMC reaffirmed its commitment to enhancing workplace safety by introducing enhanced measures to monitor and mitigate risks related to associated with drug and alcohol use. A central initiative under this effort is the planned installation of alcohol testing devices at the entrances of the Company's main facilities, to eliminate aimed at eliminating safety hazards associated with substance use.

To date, the Company has already been conducting regular alcohol testing using portable breathalyzers at various production sites. These tests are conducted three to four times per week and have been an integral part of the Company's ongoing safety practices for a significant period. As of the reporting period, 18 cases of alcohol use violations by Company employees have been recorded. The respective monitoring is currently carried out, which shows a positive decline in the numbers. As of Q3 2025, the number of violations stands at 3 cases.

In alignment with this goal, ZCMC is currently procuring four to five static alcohol testing devices for deployment at its primary facility entrances. As per the project timeline, installation is expected to be completed by the end of 2025.

Before full-scale implementation, a pilot study was conducted at the company's transport department, where a single static device was installed. This pilot phase allowed for a comprehensive evaluation of the device's operational mode, reporting procedures, and other technical parameters, ensuring its effectiveness and readiness for broader rollout.

Through these actions, ZCMC reinforces its commitment to maintaining a safe, sober, and secure working environment for all employees.

Safety Performance Metrics

GRI 403-9, SASB EM-MM-320a,EM-MM-320a.1

ZCMC remains committed to ensuring the safety of its employees and workplace, continuously monitoring and managing health and safety risks, while ensuring compliance with Occupational Health and Safety standards.

In 2024, ZCMC recorded the following safety performance metrics:

Injury rates (employees of ZCMC)[21]

Indicator	2023	2024
Number of fatalities related to ZCMC's operations (units)	0.00	**1.00**
Fatalities related to ZCMC's operations (%)	0.00	**0.12**
Number of serious injuries related to ZCMC's operations (excluding fatalities) (units)	6.00[22]	**5.00**
Severe injury rate related to ZCMC's operations (%)	0.75[22]	**0.62**
Number of LTI (units)	11.00	**10**
Lost Time Injury Frequency Rate (LTIFR) (%)	1.40	**1.25**
Total number of working hours (man-hours)	8,009,520	**7,983,472**
The main types of occupational injuries recorded in each reporting year	Falls, fractures (both open and closed), lacerations, cut wounds, abrasions, contusions, and blunt force trauma	

Injury rates (employees of contractors)

Indicator	2023	2024
Number of fatalities related to ZCMC's operations (units)	-	**-**
Fatalities related to ZCMC's operations (%)	—	**-**
Number of serious injuries related to ZCMC's operations (excluding fatalities) (units)	-	**1**
Severe injury rate related to ZCMC's operations (%)	-	**0.23**
Number of LTI (units)	2	**2**
Lost Time Injury Frequency Rate (LTIFR) (%)	0.73[22]	**0.47**
Total number of working hours (man-hours)	**≈ 2,719,080**	**≈ 4,176,000**

ZCMC reported one fatality due to a work-related injury.

On August 2, 2024, during the loading at the central warehouse (Kapan Base), a serious incident occurred involving a dual-forklift crane. The operation was carried out near the main entrance, where uneven ground conditions were present. While attempting to reposition the load, the crane began to sway (also, because of ground conditions), causing the rigging to slip and the forklift to overturn. The crane operator, who was not fastened, was ejected from the cabin and trapped beneath the equipment.

Emergency services were called, and first aid was administered by the site nurse. The victim was transported to the Kapan Medical Center, where he was pronounced dead in the intensive care unit.

This fatality once again stresses the need for stringent safety measures in compliance with occupational safety regulations.

Following the accident, ZCMC conducted a thorough investigation and implemented corrective actions to prevent future occurrences and ensure strict compliance with occupational safety regulations, including:

1. Restrict the operation of lifting equipment to authorized personnel only.
2. Perform risk assessments before initiating work.
3. Prohibit the use of unsecured equipment and enforce the use of required Personal Protective Equipment (PPE) (helmet, vest, steel-toed shoes, etc.).
4. Ensure strict oversight of certification validity issued for specialized professions.
5. Repair uneven surfaces at the Kapan Base to ensure safe working conditions.
6. Conduct unscheduled hazard identification and risk assessment at the incident site.

Embedding a safety culture throughout our workforce remains a challenge; however, ZCMC is committed to continuing to pursue this goal via continuous training and communication.

Near Misses[23]

Promoting a culture of safety awareness, the Company strongly emphasizes the identification and reporting of near misses. Employees are encouraged to report such incidents through multiple channels, including dedicated forms, safety briefings, and digital tools. Additionally, regular safety audits and inspections are conducted to identify unreported near misses. To further support this effort, a reporting hotline is accessible within the Company's production facilities and building. To facilitate this process, a hotline is available at the Company's production facilities and offices: 041 004 014.

No near misses were reported during 2024.

[21] The rates have been calculated based on 1,000,000 hours worked.

[22] 2023 data point has been restated due to data correction.

[23] Near misses are events that could have led to an accident or injury but did not. They are categorized based on severity potential, frequency, and risk level. These are classified by the type of hazard or activity involved, such as mechanical failures, human error, or environmental factors.

Strengthening Workplace Safety: Ensuring Access to Quality Occupational Health Services for Hazard Prevention and Risk Reduction

GRI 403-3

Occupational Health Services (OH Service play a crucial role in identifying, eliminating, and mitigating workplace hazards and risks. These services are designed to protect workers' health, safety, and overall well-being while promoting a productive work environment. Below is an overview of how these services are contributing to hazard identification and risk minimization, as well as how the Company ensures quality service delivery and worker access.

Professionals of OH Services conduct regular assessments to identify physical, mechanical, chemical, biological, and ergonomic hazards in the workplace. Risk assessments are conducted to evaluate the likelihood and severity of risks associated with identified hazards, enabling the prioritization of interventions based on the potential for harm. This assessment includes checking the workplace for electrical safety, fire safety, and air quality monitoring, as well as conducting noise level checks and identifying potential sources of contamination or injury. It also evaluates the physical condition of workshops, the sanitary conditions of workers, and the operation of machinery.

Employees with hands-on experience in mining operations are often directly involved in identifying hazards and conducting risk assessments. Their insights are invaluable in identifying risks that might not be obvious to higher-level managers.

Risk assessments begin with daily inspections, during which identified hazards are documented, the initial risk level is determined, and corrective actions are suggested in accordance with the risk management hierarchy.

ZCMC systematically develops and implements administrative controls, encompassing safety protocols, operational procedures, and work schedules designed to minimize exposure to hazards. For example, employees may be rotated in high-risk areas to reduce fatigue or prolonged exposure. Risk control measures may also involve the installation of safety barriers or adjustments to work processes.

Personal Protective Equipment (PPE) serves as a critical layer of defense against residual risks. We ensure the provision and strict use of appropriate PPE, including steel-toe boots, helmets, gloves, goggles, respirators, and protective clothing, to safeguard workers in hazardous environments.

Although a formal schedule for evaluating the effectiveness of hazard identification and risk mitigation measures has not yet been established, daily inspections of production areas are conducted. Through these inspections, the Health & Safety team documents and reviews identified risks and hazards based on initial observations and corrective actions. This ongoing process serves as an informal system for detecting recurring issues, responding promptly to visible hazards, and assessing the overall effectiveness of hazard control efforts.

Comprehensive Health and Safety Training: Building a Safer Workplace Through Targeted Education and Awareness

GRI 403-5, SASB EM-MM-320a.1.

ZCMC recognizes that health and safety training is a cornerstone of an effective OHS management system. It plays a critical role in ensuring the safety and well-being of employees, as well as the overall success of the Company's health and safety initiatives. Occupational health and safety training aims to equip workers with the fundamental knowledge and skills necessary to ensure their own personal safety and the safety of their colleagues within the workplace.

Training sessions are coordinated in collaboration with production managers. The process begins with a training needs assessment to identify which workshops and employee groups require training, the number of participants involved, and the appropriate duration of the sessions. Workshop managers are formally notified in writing, providing details such as the training date, participant list, location, and course length.

The training program is divided into four groups:

General Occupational Health and Safety Training

This includes an introduction to the Company's safety policies, emergency exits, evacuation procedures, basic safety rules, and the selection and use of relevant PPE such as helmets, gloves, eyewear, and hearing protection.

Training on Specific Work-Related Hazards

This training covers fire safety (identifying fire hazards and correctly using fire extinguishers), chemical safety, electrical safety, and workplace conditions such as noise and vibration.

Training on Hazardous Activities

This includes working at heights (safe use of ladders, scaffolding, platforms, and fall protection harnesses), working in confined spaces, rigging, loading and unloading works, and heavy mine equipment operation.

Training on Hazardous Situations

This is a crucial part of induction and training, preparing workers to respond to emergencies such as fires, explosions, natural disasters, or other workplace-specific emergencies.

In 2024, ZCMC continued to strengthen its commitment to occupational health and safety through a comprehensive training program delivered by the Health and Safety Department. Training sessions covered a wide range of high-risk and technical activities, including working at heights, rigging, confined space entry, firefighting, operating lifting equipment, blasting, and general safety protocols.

Over the course of the year, approximately 3,500 employees [special design needed] participated in various occupational safety training courses. On average, each employee received 30 hours of training [special design needed], ensuring a deep and sustained understanding of critical safety practices. This broad-based approach is central to creating a well-informed and engaged workforce, capable of maintaining a safe and healthy working environment.

In addition to mandatory occupational health and safety training provided to all employees, ZCMC implements a range of supplementary initiatives to reinforce safe behavior at all organizational levels. These include on-the-job safety instructions, targeted safety discussions, and specialized training modules designed to address specific operational risks.

Certain employees — such as welders, riggers, and electricians — are subject to annual certification requirements under Armenian legislation. ZCMC supports this process through focused OHS instructions tailored to the unique hazards associated with each role. These targeted efforts ensure that compliance is not only met, but also exceeded through practical, risk-specific training.

By delivering both general and role-specific safety education, ZCMC significantly reduces the risk of workplace accidents, injuries, and occupational illnesses — contributing to a safer, more resilient work environment for all.

Over the course of the year, approximately

3,500 employees

participated in various occupational safety training courses

On average, each employee received

30 hours

of training

Injury rates (employees of contractors)

Training program	Number of participants (2023)	Number of participants (2024)
General occupational health and safety training for new employees and employees with job rotation	478	593
Working at height	379	354
Riggers	418	455
Operating in confined spaces	195	181
Firefighting	161	184
The examination, qualification, and re-certification of lifting operators	129	134
The examination, qualification, and re-certification of blasters	34	36
Welders	-	97
Verification, qualification, and requalification of operator knowledge for the safe operation of pressure vessels and equipment	-	66
Safe driving	-	179
Training for shift masters	146	**152**

Comprehensive Health and Safety Support: Ensuring Well-being Through Access to Medical Services

GRI 403-6

ZCMC is committed to promoting the health and well-being of its employees by providing a comprehensive range of on-site medical services, healthcare support, and partnerships with external medical providers.

The Company collaborates with medical centers in Kapan and Kajaran and has established a collective agreement with an insurance company to cover all employees and their family members. This partnership allows employees to access non-occupational medical services, including general health check-ups, mental health support, preventive care, and specialist referrals.

Additionally, a dedicated team in the Medical Services Division provides supplementary support for cases not covered by the insurance package. The ZCMC Charitable Fund covers the additional healthcare expenses for the employees and their families.

Within the Company's territory, fourteen operating first aid rooms are designed to provide immediate medical care for injured or ill workers before receiving further medical attention. Given the high-risk nature of the mining industry, these well-equipped first aid rooms are essential for handling injuries, emergencies, and occupational health concerns.

SASB EM-MM-320a.1.

In 2024, ZCMC recorded 61 first aid medical treatment cases and five no-day lost cases requiring medical treatment beyond first aid.

Pre-employment Medical Examinations

ZCMC ensures that employees undergo pre-employment medical examinations and annual health check-ups. Before starting work, employees receive a thorough medical check-up to confirm their fitness for the job. This includes a general physical examination, lung function tests (spirometry), spirometry, chest X-rays to check for lung diseases such as pneumoconiosis, hearing tests (audiometry), vision tests, blood and urine tests, and electrocardiograms (ECGs) if required, especially for workers in high-risk categories.

Regular Medical Check-ups

Regular medical check-ups are crucial for the prevention and early detection of diseases, ensuring the long-term well-being of employees. Early detection is also essential for the employee's ability to promptly address any medical issues and perform their duties effectively in the long run. These check-ups typically include respiratory health assessments to monitor conditions related to dust exposure, such as silicosis and asbestosis; hearing tests to detect noise-induced hearing loss; blood tests to assess exposure to heavy metals like lead, mercury, and arsenic; liver and kidney function tests to identify effects of toxic chemical exposure; musculoskeletal evaluations to detect joint or spinal problems; and cardiovascular screenings, particularly for workers in high-altitude or high-stress environments.

In 2024, employees exposed to hazardous working conditions were required to undergo mandatory medical examinations.

A total of **3,010 employees**

including **450 women** were scheduled for these check-ups

Of these, 2,983 employees — 448 of whom were women — were examined, resulting in a high overall coverage rate of 99.1% and 99.6% for women. No cases of occupational diseases were identified.

The scheduling of the examinations was coordinated with the Company's work schedule to ensure accessibility and convenience for employees.

In instances where medical conditions incompatible with specific job requirements are identified, decisions regarding the employee's ability to continue working are made in accordance with the legislation of the Republic of Armenia.

For administrative personnel, ZCMC prioritizes ergonomic improvements, mental health support, effective workload management, and flexible working arrangements to mitigate risks associated with psychological well-being. Since these employees are not continuously exposed to hazardous production factors throughout their 8-hour workday, they are not subject to annual periodic medical examinations.

Local Communities: Building Engagement and Shared Value

98 — Community Investments
101 — Community Needs and Impact Assessments
102 — Stakeholder Engagement

GRI 3-3

We have been part of the community for over seven decades, just as the communities have been part of our operations for the same extended period. Generations of our employees are simultaneously generations of residents of these communities.

For ZCMC, fostering shared values with our communities has been an organic and integral part of our operations. Recognizing that any mining operation impacts the surrounding communities in various ways, we strive to minimize and offset any potentially harmful effects through meaningful engagement and cooperation, as well as constructive and sustainable contributions to both communities and the environment. Maintaining collaborative, transparent, and respectful relationships with our communities and other stakeholders is fundamental to our long-term success.

While we have decades of history of comprehensive engagement with the communities, we also strive to put those relationships into an institutional framework, in line with the industry's best standards and practices.

The Company signed memorandums on social contribution with affected communities, in 2022-2023. We further institutionalized our social engagement by adopting a Social Policy and Human Rights Policy in 2024 to guide responsible and inclusive practices across our operations, thereby strengthening trust and deliver long-term positive outcomes for current and future generations. Our stakeholders, including employees, local communities, shareholders, and contractors, have a legitimate expectation that we will operate in a manner that supports sustainable development and delivers mutual benefits and shared values.

ZCMC manages its social activities in line with the laws of the Republic of Armenia. Relevant international frameworks, including the UN Declaration of Human Rights and the IFC Performance Standards on Environmental and Social Sustainability, guide our social management operations. We also encourage our business partners to uphold these same commitments.

Since early 2022, the Sustainable Development Directorate has established a dedicated social management team. Our Social Department comprises two social management experts, two community relations staff members, and two local development specialists. A highly experienced senior expert with an extensive international background in social development leads the team.

Social Responsibility

Social responsibility lies at the heart of ZCMC's business values. Consequently, our goal is to foster vibrant, sustainable communities, focusing on initiatives that promote both the social and environmental well-being of the area. These initiatives include community engagement, local businesses development, and an increase in the employment rate with competitive wages. Additionally, up to 90% of our employees are from the local communities of Kajaran and Kapan, and approximately 10% are from other communities in Syunik Marz, making ZCMC a truly community-based and operated enterprise.

ZCMC's commitment to promoting well-developed and economically diverse communities goes well beyond providing job opportunities. In fact, our goal is not to create dependence on employment with ZCMC, but to empower local communities to become more independent and resilient. We therefore focus on improving the foundations of community wellbeing through investments in critical areas such as health and education, infrastructure, sport, culture, local procurement and entrepreneurship, and capacity building. These efforts aim to strengthen local communities, enabling them to grow sustainably by leveraging their capacities, resources, and strengths, and to create jobs within their own communities.

Maintaining trust is essential in our community relations; we therefore prioritize open and transparent communication with all stakeholders. We ensure they are well informed, treated with respect, and involved in decision-making whenever appropriate.

We use every opportunity to actively engage through various channels, including individual meetings, focus group discussions, social surveys, consultations with local NGOs, community members, and local government representatives.

Additionally, we strive to set an example for our partners on how to apply the same standards of respect and inclusiveness when interacting with communities, ensuring consistency in our approach to building long-term trust.

Cultural Heritage

SASB EM-MM-210b.1.

The preservation and restoration of cultural heritage sites are ongoing priorities that are incorporated into social development initiatives. To illustrate this, a permanent agreement is in place with the Institute of Archeology of the Academy of Sciences of the Republic of Armenia, which conducts on-site monitoring of development projects as needed to ensure the preservation of cultural heritage and compliance with the relevant procedures.

Responsible Partnerships

We uphold high standards in our business relationships with partners, including contractors and suppliers. ZCMC requires that they adhere to the same environmental, social, and governance principles. Regular audits, performance monitoring, and compliance reviews help verify that partners meet these expectations and continuously improve their practices as needed.

Community Investments

GRI 203-1

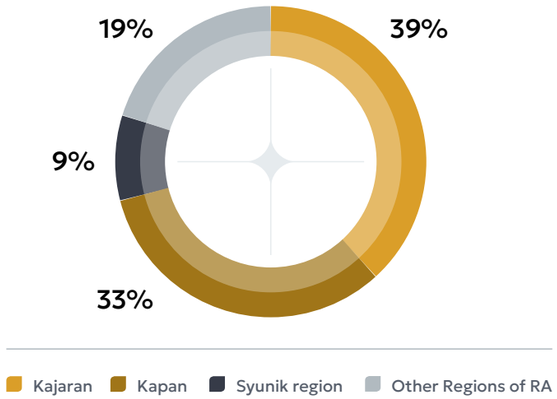
ZCMC is committed to fostering community development through initiatives that go beyond its core business operations. By consistently investing in rural infrastructure and supporting local and regional governments through subvention projects, the Company helps strengthen essential community services and facilities. These efforts are complemented by substantial annual contributions to healthcare, education, and social support, benefiting both local communities and ZCMC's workforce.

Working in close partnership with local communities and municipal authorities, ZCMC implements critical infrastructure projects and other initiatives that generate shared value. These collaborations are formalized through the Community Development Memoranda of Understanding (MOUs) and various partnership agreements with local NGOs, ensuring a shared vision and development, while emphasizing accountability and binding commitments by the parties.

In addition, the Company actively supports cultural, artistic, and youth-focused programs, including sports and cultural initiatives, helping to enrich community life and promote opportunities for young people.

In 2024, community investments totaled approximately USD 18.3 million, representing a decrease of about 9% compared to 2023. Social investments were carried out through ZCMC Charitable Foundation, a key portion of which was directed to Kajaran and Kapan.

Breakdown of Social Investments per Region, 2024



A significant portion of social investments was allocated to infrastructure programs and support for municipalities to address priority issues within the agglomerated communities. Community infrastructure projects are identified annually through structured consultations with the community and regional municipalities, the Social Development Department within the Municipalities, and senior management. This process includes annual community data updates, periodic needs assessments, socioeconomic surveys, and other relevant activities. The final list of infrastructure investments is shaped by these assessments and integrated into the annual subvention and infrastructure programs.

A detailed sectoral breakdown of the investments in 2024 is presented below:

Community investments detailed breakdown by sector and geography (in thousands USD)[24]

Sector	Kapan	Kajaran	Syunik	RA other regions	Total	Share
Social aid including aid to individuals (also employees), communities, infrastructure development, construction, subvention	3,830	2,935	1,299	—	**8,064**	43.98%
Medical treatment, health facilities	477	533	51	54	**1,114**	6.08%
Tuition fee, support to educational institutions	318	318	—	1,148	**1,784**	9.73%
Development of sport (including Syunik Football Club)	1,461	124	—	135	**1,720**	9.38%
Cultural events (including Syunik TV)	1,005	48	—	70	**1,123**	6.12%
Support to organizations and Fund (health, social, disabled, mining)	—	—	311	1,004	**1,315**	7.17%
Support to army	—	—	—	1,177	**1,177**	6.42%
Airport and airplane maintenance	—	2,041	—		**2,041**	11.13%
Total	**7,091**	**5,999**	**1,661**	**3,587**	**18,338**	**100%**

The Company is committed to supporting the social well-being of residents in affected communities, providing monthly assistance to all households. In 2024, approximately USD 1.6 million was allocated in the form of monthly payments to support around 1,250 individuals in five affected communities as part of the land use compensation program.

The total number of individuals who received health or social assistance, educational scholarships, or participated in youth and children's programs through various partnership initiatives reached approximately 7,770, primarily in the affected communities. Additionally, ZCMC supported sports and cultural programs, which have had a profoundly positive impact on hundreds of young people.

[24] USD 1 = AMD 392.73

Partnership programs with local NGOs[25]

In 2024, ZCMC partnered with 13 NGOs and other organizations to implement initiatives that support children with disabilities, strengthen health services for disadvantaged groups, and promote rural development.

These programs specifically targeted vulnerable households through greenhouse projects, provided educational opportunities for children and youth, and supported vulnerable families with access to solar energy solutions.

During the reporting period, solar power plants and solar water heaters were installed in Syunik Marz.

Specifically, as part of a partnership with the company "Freenergy", 2.32 kW solar power plants and 200-liter water heating systems were installed for 38 beneficiary households in our affected communities of Kapan, with a total program cost of USD 81,300. Additionally, through a collaboration with the environmental NGO «Kanach Eco Region", solar water heaters were provided to families with four or more children across four affected communities. This project benefited 24 families in total: 18 in Artsvanik, 2 in Chapni, 1 in Sevakar, and 3 in Achanan, with a total cost of approximately USD 38,000. These partnership initiatives are also planned for 2025, aiming to support 140 beneficiaries in Syunik village, with a projected total budget of USD 293,000. The Company also plans to install 26 additional solar panels in Erkenants village.

Accountability is a critical component of ZCMC's partnership programs. The Social team conducts regular monitoring visits to project sites to assess the projects for compliance with agreed-upon targets and expected results. It gathers feedback from NGOs and project beneficiaries. Key findings, observations, and recommended actions from these visits are systematically documented for internal use and shared with implementing partners to support continuous improvement.

To further strengthen accountability, NGOs are required to submit quarterly progress and financial reports using standardized templates provided by ZCMC. These reporting requirements are clearly outlined in the partnership agreements to ensure commitment to the Company's standards for accountability and transparency.

Many of the social investment projects are based on the priority needs of the communities. Their needs are assessed through structured surveys, annual baseline data collection, focus group discussions, and meetings with municipal authorities, local NGOs, and community members. This information provides a critical foundation for designing community-based development investments.

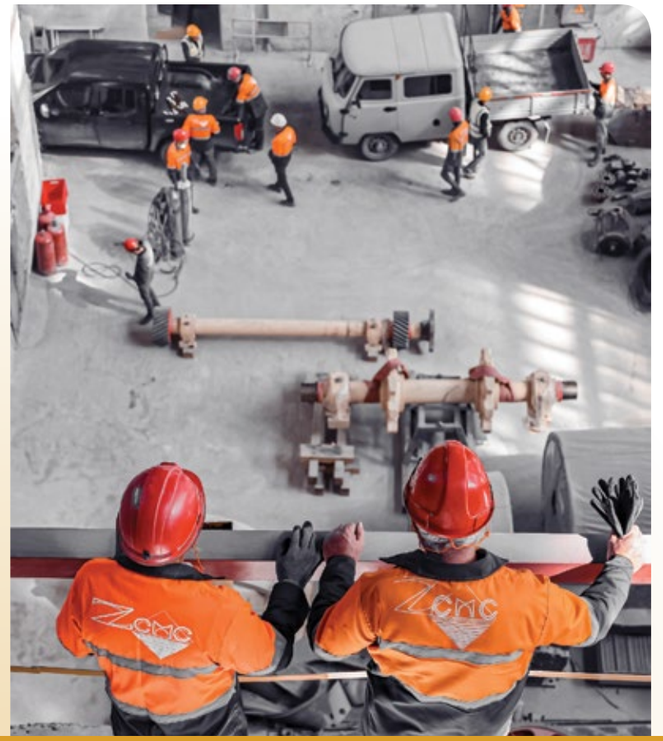
The Company works closely with state authorities to remain vigilant for conflict risk preparedness, considering the project's proximity to high-risk border areas. In 2024, ZCMC continued to provide humanitarian aid to displaced ethnic Armenians from Nagorno-Karabakh, who settled in the project-affected communities.

[25] Partnership programs are those agreed with and supported by ZCMC through binding agreements to deliver improved services for children with disabilities, health services for disadvantaged, rural development, etc. Other support to NGOs includes monetary support to various organizations such as the Armenian Mining Association, other funds, etc. So, the total NGO support goes to both ZCMC-supported projects, and other organizations to help with their ongoing activities.

Community Needs and Impact Assessments

GRI 413-1, SASB EM-MM-210b.1.

To ensure a thorough understanding of community dynamics, the Company has consistently gathered annual baseline data since 2022 across all affected communities. This ongoing effort captures valuable information on population trends, patterns of vulnerability, employment levels, community infrastructure, migration dynamics, and emerging challenges and priorities. By maintaining a consistent, year-on-year data collection process, the Company can track changes over time and more effectively reflect them in social investment areas and programs.



ZCMC, with facilitation from Wardel Armstrong International (an international consultancy within the SLR group), undertook extensive community engagement efforts in 2024. This included a broad survey administered through two methods: interviews with key informants and focus group discussions with women across five communities. The focus groups were held with women only in all communities to ensure gender-specific feedback. Discussions focused on the needs of the communities, social and economic issues, community health, challenges faced by women, livelihoods, employment, etc. Women's perspectives were meaningfully represented in the data collection process. The assessment results are then communicated to identify the key areas where we can focus our efforts.

Building on this effort, in the fall of 2024, our international consultant, together with the local team, finalized the Terms of Reference for a more extensive household survey spanning 16 affected communities. The fieldwork for this survey was conducted in winter 2025, encompassing a structured socio-economic study of approximately 915 households. The topics included demographics, family composition, livelihood activities, health, transportation, water access, education, household income and expenditure patterns, lifestyle, employment, migration, land use, nutrition, available services, cultural heritage, and social cohesion.

More detailed information on the results of the study results will be provided in the 2025 Report.

Stakeholder Engagement

GRI 2-29

ZCMC established a comprehensive Stakeholder Engagement Plan (SEP) to guide its engagement with a broad range of internal and external stakeholders. This plan is aligned with international best practices and serves as the foundation for building transparent, inclusive, and responsive relationships.

Stakeholder categories include employees, adjacent and affected communities, NGOs, contractors, suppliers, government authorities (local, regional, and national), as well as academic and civil society institutions.

ZCMC identifies and prioritizes stakeholders through a structured stakeholder mapping process. This process classifies stakeholders as internal or external. It assesses them based on factors, including level of influence, interest in the Company's activities, proximity to operations, vulnerability, and the degree to which the Company's activities may impact them. This assessment enables ZCMC to take a targeted and inclusive approach, ensuring that the most relevant and affected stakeholders are appropriately engaged.

The core objectives of ZCMC's stakeholder engagement activities are to maintain its social license to operate, build mutual trust, promote transparency, secure community support, and ensure stakeholders are informed and heard.

To achieve these goals, ZCMC utilizes a combination of methods, including:

- Consultations and public hearings to ensure open dialogue and information sharing;
- Structured communication channels for regular updates and feedback;
- Social programs and investments aligned with community needs;
- Periodic social surveys and focus group discussions to gather insights and concerns;
- Electronic tracking systems for documentation, monitoring, and follow-up.

Engagement occurs on an ongoing basis through face-to-face meetings, formal consultations, public events, and digital communication platforms. In 2024 alone, the social performance team conducted over 50 formal meetings with a range of stakeholders, including NGOs, community leaders, and public institutions. Stakeholder feedback is actively considered in operational planning and decision-making.

All engagement activities are systematically documented. Tools include:

- A meeting log to record all formal interactions with communities, local NGOs, and other relevant organizations;
- A visitors' log to track site visits;
- A grievance log to track complaints, resolution timelines, and recurring issues;
- A community request database, which classifies requests by gender, region, sector, and type.

Environmental Stewardship and Resilience: Commitment to Continuous Improvement

109 — Energy Management Strategy: Monitoring, Optimizing, and Reducing Energy Consumption
111 — Water Management Strategy: Managing Scarcity Through Responsible Stewardship and Compliance
116 — Waste Management: Monitoring, Reduction, and Regulatory Alignment
119 — Air Emissions Control: Emission Reduction Initiatives: Enhancing Workplace Safety
121 — Tailings Infrastructure and Monitoring: Strengthening Safety Systems and Aligning with Global Standards
122 — Biodiversity Management and Ecosystem Restoration: Aligning Operations with Ecological Standards and International Frameworks
124 — Environmental Restoration and Closure Planning: Integrating Restoration with Active Operations and Long-Term Environmental Goals

SASB EM-MM-160a.1

At ZCMC, we strive to make sustainability not just a goal, but a core guiding principle embedded in every aspect of our operations.

Led by our Sustainable Development Director and supported by a proficient Environmental Department, we take a proactive approach to managing our environmental impact. Our performance is being assessed through internal and external audits, risk evaluations, and engagement with stakeholders.

Governance Improvements Achieved in 2024

In 2024, ZCMC reached several milestones in advancing its environmental governance. Three significant policies were developed and formally approved by the Board of Directors, reflecting a substantial step toward more strategic and integrated environmental management:

- The Environmental Policy outlines our goal to adopt sustainable environmental practices across all areas of operation and to minimize our overall ecological footprint.
- The Climate Change Policy defines our strategic approach to managing climate-related risks, enhancing resilience, and supporting the transition to a low-carbon, sustainable economy in Armenia.
- The Biodiversity Policy underscores our commitment to minimizing both direct and indirect impacts on biodiversity, in alignment with the core principles of IFC Performance Standard 6.

Together, these policies represent our commitment to our commitment to a shift from a purely compliance-driven model towards a forward-looking, proactive approach anchored in long-term impact reduction, ecosystem protection, and environmental leadership.

Environmental Management Framework

As mentioned in the 2023 Sustainability Report, ZCMC's Environmental Management Framework is based on 12 specialized Management Plans that address critical environmental domains, including waste, water, soil, air, hazardous materials, and biodiversity. Mainly developed in collaboration with external environmental, health, and safety experts, these plans are integrated across the entire asset lifecycle from pre-bid due diligence and exploration to development, operations, closure, and site rehabilitation. Notably, the Waste Management Plan was developed in-house, highlighting the strength of ZCMC's internal environmental expertise.

Key system enhancements in 2024 included:

1. Launch of the Environmental Monitoring Plan to support continuous, data-driven tracking of operational impacts on surrounding ecosystems.
2. Expansion of ecosystem and biodiversity safeguards with increased focus on buffer zones near sensitive areas such as Arevik National Park.
3. Reinforcement of the Hazardous Materials Management Plan, broadening its scope to include not only internal operations but also contractors, suppliers, and nearby communities.

Additionally, procedures have been established to enhance the implementation of these plans, which are reviewed on an annual or biannual basis. These enhancements reflect ZCMC's ongoing efforts to operationalize environmental responsibility through a structured, lifecycle-based approach grounded in international best practices.

Alignment with International Standards and ESG Recommendations

During the reporting year, ZCMC deepened its alignment with internationally recognized environmental and sustainability standards, reaffirming our commitment to responsible and future-focused mining practices.

We undergo annual recertification to ISO 14001, ensuring we remain consistent with standard requirements and continually improve our environmental management systems. In parallel, we advanced our integration of the IFC Performance Standards, with particular focus on key areas such as biodiversity (PS6), pollution prevention (PS3), community and occupational health and safety (PS4), and risk management (PS1).

In 2024, independent assessments were conducted to evaluate our level of alignment, resulting in a set of targeted, actionable recommendations to strengthen our environmental performance further:

- Expanding the Environmental Management System to integrate real-time environmental monitoring.
- Expanding greenery and revegetation initiatives around the TSF and along maintenance access roads.
- Enhancing the containment systems and emergency response planning for hazardous material handling.
- Strategic planning to upgrade temporary hazardous waste storage facilities and improve workshop decommissioning procedures.
- Improving visual and ecological restoration efforts near the Achanan River discharge point.
- Developing a comprehensive biodiversity baseline in collaboration with external experts and national park authorities.

Implementation of these measures is currently underway and forms an integral part of ZCMC's broader roadmap for alignment with the IFC Performance Standards and increased transparency in ESG disclosure.

In addition, ZCMC initiated internal preparations to pursue an international ESG rating, marking a significant step in our sustainability journey. This includes aligning our reporting practices with leading global disclosure standards such as SASB and GRI and launching internal ESG benchmarking to enhance both transparency and performance.

Energy Management Strategy: Monitoring, Optimizing, and Reducing Energy Consumption

GRI 3-3, 302-1, 302-4, SASB EM-MM-130a.1.

Our energy management strategy is designed to monitor and optimize energy consumption across all operations. Through regular energy audits and the use of performance metrics, we identify opportunities to enhance efficiency and reduce energy use.

We continuously refine our approach by implementing targeted energy-saving initiatives, such as upgrading equipment, optimizing operational processes, and deploying advanced systems for real-time energy monitoring and control.

In 2024, our efforts focused on identifying pathways to reduce energy consumption, increase the use of grid electricity sources from relatively low-cost providers, and enhance overall operational efficiency. A key area of progress was the further development of our Energy Monitoring System and the improvement of internal reporting across workshops and sites.

As the largest consumers of electricity in RA, we have not yet integrated renewable energy into our operations; however, we have already taken meaningful steps to diversify our electricity sources. To strengthen our energy resilience, we aim to diversify our procurement by expanding sourcing from Armenia's free electricity market while maintaining a stable supply from the Armenian Nuclear Power Plant. Looking ahead to 2025, we plan to launch two major renewable energy initiatives — solar and wind energy production units- to support our internal energy needs. These projects are expected to reduce overall consumption, improve energy efficiency, and lessen our carbon footprint. In parallel, we are actively engaged in developing a long-term Climate Change Strategy, which we will communicate in due course.

ZCMC's primary energy source remains electricity, which accounts for over 61% of total energy consumption[26]. This is followed by diesel, used mainly for heavy machinery in open-pit operations, and petrol, used primarily for light vehicles in workshops and sites. Natural gas is used for steam production[27].

[26] The Company does not generate its own energy locally.

[27] Steam production comprised 50,005 MWh in 2024. All steam was used internally, with no sale of heating, cooling, or additional energy forms.

Total energy consumption (in gigajoules)[28,29,30]

Indicator	2023	2024	Percentage change
Diesel products	882,594	**984,445**	11.54%
Petrol products	38,264	**42,008**	9.78%
Natural gas	228,240	**203,317**	-10.92%
Purchased or acquired electricity	1,908,113	**1,919,553**	0.60%
Total consumption from non-renewable sources	**3,057,211**	**3,149,323**	**3.01%**
Electricity sold	-34,375	**-24,002**	-30.18%
Total energy consumption	**3,022,836**	**3,125,321**	**3.39%**

In 2024, total energy consumption within ZCMC increased by around 3%. The increase in energy consumption is primarily due to the transportation of heavy and light vehicles. ZCMC is actively working to identify and implement energy-saving measures to mitigate the negative impact of this increase.

The energy intensity ratio was calculated to assess and manage the efficiency of energy use in producing copper-molybdenum concentrate.

GRI 302-3

Energy intensity based on the output of copper-molybdenum concentrate[31]

Indicator	Unit of measurement	2023	2024	Percentage change
Total energy consumption	GJ	3,022,836	3,125,321	3.39%
Energy intensity	GJ/ton	13.43	15.63	16.38%
Copper-molybdenum concentrate	Tons	225,042	**199,934**	-11.16%

Energy intensity based on revenue

Indicator	Unit of measurement	2023	2024	Percentage change
Total energy consumption	GJ	3,022,836	3,125,321	3.39%
Specific energy consumption	GJ/million USD	3,799	4,383	15.38%
Revenue[32]	million USD	795.787	**713.087**	-10.39%

[28] Data for 2024 has been collected and verified by the Production Service Department and compiled from all major workshops and operational sites.

[29] A separate amount of energy consumption for heating and cooling has not been monitored during 2024 and is not available.

[30] ZCMC is planning to make continuous improvements in our data collection and management processes by developing a clear methodology for energy consumption estimation in the coming years. These processes will be organized to enhance efficiency, minimizing human intervention by applying automated tools and calculation methods. In addition, ZCMC has already started conducting training sessions for its relevant employees to ensure that they have the skills necessary to accurately and effectively collect and manage energy consumption data. Currently the data collection process is primarily conducted through calls, messages, and discussions. While there is no single standardized methodology in place, the data is refined based on information received from the Accounting Department, and additional mechanisms are applied to ensure the accuracy and reliability of energy consumption data.

[31] Data for this calculation were gathered from various departments within ZCMC, including the Production and Production Service Departments. The methodologies and conversion factors used for these calculations follow industry standards and have been verified by the Company's internal audit team to ensure accuracy and consistency. All types of energy are included in the intensity ratio calculation.

[32] The revenue of ZCMC CJSC and Ler-Ex LLC is presented.

Water Management Strategy: Managing Scarcity Through Responsible Stewardship and Compliance

GRI 3-3, GRI 303-1, GRI 303-2

As a vital input to our operations, water remains a strategic concern. In 2024, we continued to experience the effects of climate change driven regional water scarcity across our sites. In response, we have deepened our long-term commitment to sustainable and efficient water management practices. Our approach is guided by a comprehensive Water Management Plan, which is aligned with both national regulations and International Finance Corporation (IFC) performance standards. This plan outlines how we source, monitor, use, and discharge water across all the Company facilities, ensuring our practices support both operational needs and environmental responsibility.

As part of its continued commitment to sustainable water management, the Company established a dedicated department within the Technical Directorate at the end of 2023 to oversee all aspects of water resource management and hydrological structures within the ZCMC territory. Throughout 2024, this newly formed department has been working closely with other relevant teams to develop a comprehensive water management strategy and establish clear, actionable goals. Priorities include increasing the stability of the TSF dam, enhancing water recycling efforts, and advancing various sustainability initiatives. This integrated approach positions the Company to manage water resources more responsibly and build long-term resilience against future challenges.

Implementation of the Water Management Plan is overseen by the Sustainable Development Director and the Environmental Department, with day-to-day support provided by the Production Service Department.

The Ministry of Environment of the Republic of Armenia oversees the Company's water management activities. As part of the regulatory process, the Company prepares and submits a project proposal detailing its estimated water demand for production as well as its wastewater requirements. Following its review of the submission, the authorized agency grants a Water Use Permit[33]. This permit specifies the approved water intake points, allowable extraction volumes, and other key conditions.

[33] In case of exceeding the norms of water use and water drainage set by the Company's WUP, the Company pays overpayment to the government in accordance with the requirements set by the RA Tax Code: https://www.arlis.am

Within the Company, adherence to the permitted water use is closely monitored through internal control measures. These include supervision by designated staff members of the Environmental Department and the installation of water meters at each water intake point, ensuring that actual consumption remains in full compliance with the conditions defined in the Water Use Permit.

Stakeholder engagement is a cornerstone of the Company's approach to water governance and environmental stewardship. We maintain an active dialogue with local communities and municipal authorities, particularly in Kajaran, to identify potential impacts and collaborate on inclusive, effective solutions. One promising initiative under discussion involves treating and reusing municipal wastewater for industrial processes. Feasibility studies and implementation planning are currently underway, intending to create shared water value that benefits both the Company and the surrounding communities. In 2025, we plan to assign a contractor to implement the work and start purchasing the corresponding materials for the construction of the plant.

Planned Water Management Initiatives:

1. Construction of a Thickener, which decrease the use of freshwater and reuse about 20% of industrial water.
2. Utilize water from the open pit for ore enrichment processes and dust suppression, thereby reducing reliance on freshwater resources.
3. Establish a vehicle repair and maintenance facility within the administrative area of the open pit to enable proper wastewater management.
4. Install a modern treatment unit with a recirculating system at the open-pit vehicle wash station to minimize freshwater consumption and prevent wastewater discharge into natural water bodies.
5. Ensure continuous monitoring of water consumption through the installation of water metering devices on freshwater pipelines, complemented by an automated water level monitoring system on reservoirs.

These initiatives are planned to be completed by 2027.

Water Withdrawal

GRI 303-3, SASB EM-MM-140a.1

Throughout 2024, the Company continued sourcing water from 13 primary intake points, including Makanajur, Saxqar 1 and 2, Pukhrut, several locations along the Voghji River, the Geghi Reservoir, and the Artsakh drainage tunnel. These water sources support both technical operations, such as ore processing, dust suppression, and equipment washing, as well as communal needs like landscape irrigation at the nursery.

Over the year, the Company withdrew a total of 50,650 megaliters of water. The vast majority of this, approximately 49,960 megaliters, or nearly 99% of technological water use, was consumed by the Processing plant, primarily during ore grinding and flotation processes. The remainder supported auxiliary operations, including activities such as vehicle maintenance, irrigation of green areas, and environmental management.

Most of the withdrawn water, approximately 48,383 megaliters, was classified as freshwater having a TDS level of 1,000 mg/L or less. The remaining 2,267 megaliters came from sources with higher dissolved solids, primarily from the Artsakh drainage tunnel (TDS > 1,000 mg/L).

To maintain oversight, we continued monthly water quality monitoring at intake points, focusing on parameters such as TDS. Where metering infrastructure was lacking, intake volumes were estimated based on internal measurements and flow modeling.

Following the Company's risk-based management approach and our ISO 14001:2015 certification, a thorough 5x5 risk matrix assessment of water intake points was carried out in 2023 and remains applicable for 2024. This assessment evaluated all water intake locations for baseline water stress using data from the World Resources Institute (WRI) Aqueduct tool.

While none of our operational sites were found to fall under high (40-80%) or extremely high (> 80%) baseline water stress, moderate stress conditions (exceeding 20%) were identified at several critical intake points, including Saxqar 1, Saxqar 2, Pukhrut, and parts of the Voghji River.

Total volume of withdrawn water (in megaliters)[34]

Indicator	2023	2024	Percentage change
Total volume of water withdrawn	**47,164**	**50,650**	**7.39%**
Surface waters, including swamps, rivers, lakes	47,027	**50,487**	7.36%
Third-party waters (municipal and other water supply systems)	137	**163**	18.98%

The increase in surface water use in 2024 is primarily due to the higher volume of ore processed during the year, which was 899,62 thanoin compared to 2023.

The increase in water purchased from third parties is primarily due to higher volumes obtained from the municipal utilities of Kapan and Yerevan.

In Kapan, most of the purchased water was used for irrigation at the Company's nursery. Notably, in 2024, a metering device was installed on the nursery's water supply line, allowing for more precise measurement of consumption. In Yerevan, the increase in water use is attributed to the establishment of two new administrative offices.

[34] No groundwater, or industrial water was used.

Water Discharge

GRI 303-4, SASB EM-MM-140a.1

Total water discharge in 2024 was approximately 39,318 megaliters, most of which was released into surface water bodies in accordance with the applicable Water Use Permit and environmental legislation.

Total volume of discharged water (in megaliters)[35]

Indicator	2023	2024	Percentage change
Total volume of water discharge by destination	**36,692**	**39,318**	**7.16%**
Surface water, including	36,654	**39,270**	7.14%
Water from third-party sources	39	**48**	23.08%
Freshwater	23	**23**	0%
Other water	36,631	**39,247**	7.14%

Discharge sources include multiple operational and municipal points, each of which is subject to periodic quality monitoring. The primary discharge point is the Artsvanik TSF, where water flows from the 4th tunnel into the Achanan River. This process-affected water is monitored for various pollutants to ensure compliance with regulatory requirements. Additional discharges occur at Geghi and Lernadzor, where cooling waters, classified as clean freshwater, are released. The Voghji River receives water from sedimentation basins as well as city sewerage systems from Kajaran and Kapan.

Breakdown of the total volume of water discharged in 2024

Discharge points	Effluent category	Quantity of effluents (in megalitres)	Discharge information
Achanan River (Norashenik tributary of Voghji River)	Other water (technological wastewaters)	39,248	Waters of the Artsvanik TSF pond
Geghi River	Normative clean freshwater	11	Excess/surpluses of cooling waters of the 1st recovery pumping station
Lernadzor stream	Normative clean freshwater	11	Excess/surpluses of cooling waters of the 2nd recovery pumping station
Voghji River	Industrial normative clean freshwater	1	Discharged from the cutting site of the staples samples after mechanical cleaning (does not require further cleaning)
Sewage collector of Kajaran City	Industrial and domestic, requires cleaning	20.2	Wastewater from domestic use
Sewage collector of Kapan and Yerevan cities	Domestic, requires cleaning	27.6	wastewater from domestic use
Total discharge		**39,318**	

[35] The volume of wastewater discharged from the Artsvanik tailings pond to the Achanan River was measured and determined using a water meter. In all other cases, the discharge volume was determined by calculation based on the volumes of water used.

Effluent quality monitoring is carried out in collaboration with certified laboratories and local municipal partners, including Veolia Djur and the Kajaran Utility Service, which are responsible for monitoring the quality of municipal/domestic wastewater. Additionally the Ministry of Environment and the Environmental Protection and Mining Inspection Body are responsible for industrial wastewater quality control.

SASB EM-MM-140a.2.]

During the reporting year, effluent quality was assessed at two key locations. At the Achanan River, 50 samples showed exceedances in molybdenum, manganese, iron, and sulfate ions, linked to discharges from the tailings pond. To minimize the impact, we are planning to treat the water to comply with all permissible limits. Meanwhile, at the Voghji River near the metal staple cutting site, seven samples were analyzed, with only one exceeding the suspended solids limit, indicating relatively stable discharge quality at that location.

Water Use and Consumption

GRI 303-5, SASB EM-MM-140a.1

In 2024, total water usage across all operations reached 11,332 megaliters, about 8% more than in 2023. Compared to the estimated total water availability of 535,995 megaliters in the relevant river basins, the Company's water consumption accounted for roughly 2.11% of this resource.

Water consumption within the Company's operations involves a range of irreversible losses inherent to normal industrial processes. Although specific measurements of evaporation or water incorporated into final products are not currently tracked, these irreversible losses are estimated to arise from several key operational areas. For example, water used for dust suppression evaporates and cannot be recovered, while additional evaporation and seepage occur from tailings make pond and dam. Water is also absorbed into the tailings floor, permanently removing it from the operational cycle.

Water is also used in the generating process, such as for steam generation during drilling and ore concentration, with a portion of it being lost during these operations. Additionally, some water remains bound in the final concentrate and is not returned to the system. Further losses occur through machinery cooling systems, mainly due to evaporation and system inefficiencies. Finally, hydro-cleaning activities at production facilities cause technological water losses, estimated to range between 3% and 6.5%.

Waste Management: Monitoring, Reduction, and Regulatory Alignment

GRI 3-3, SASB EM-MM-150a.10, GRI 306-1, GRI 306-2

ZCMC continues to prioritize responsible waste management across all areas of its operations. The Environmental Department, together with designated employees accountable for waste management, oversees every stage of the process — from waste classification and collection to final disposal — with a strong emphasis on sustainable practices.

Our waste management system adheres to local and international frameworks, including ISO and IFC standards, and is regularly audited. The Company's waste management performance is monitored using key metrics, including waste reduction, recycling rates, and alignment with regulatory standards.

In 2024, the Company achieved advancements in strengthening its waste management practices, aligning with both environmental regulations and broader sustainability objectives. Key developments include:

- Enhanced interdepartmental coordination to streamline waste handling processes.
- Revised Waste Management Plan to comply with updated environmental regulations.
- Ongoing efforts are aimed at phasing out luminescent lamps due to the limited availability of recycling solutions.
- Promoting sustainable alternatives, such as encouraging the use of fabric bags over plastic, can help reduce plastic waste.

We have updated our Hazardous Waste Management Plan to ensure the safe handling of high-risk materials. The Company manages various waste streams through clearly defined procedures tailored to each type of waste. These include lead-acid and office batteries generated from vehicles and technical operations; used oils from machinery and maintenance activities; scrap metals, contaminated sand, and laboratory waste related to metal processing; as well as hazardous building materials and contaminated textiles resulting from operational activities.

To ensure the safe and effective handling of specialized waste, ZCMC collaborates closely with certified third-party contractors who are licensed to operate in this highly regulated field. These partnerships enable the use of advanced waste treatment technologies, including pyrolysis for oils and textile waste, as well as the recycling of scrap metals into reusable raw materials.

To ensure that third-party waste handlers comply with contractual and legal obligations, we periodically conduct site visits to their operational facilities to observe and monitor their waste management processes. Additionally, we regularly request copies of the required permits and licenses to verify that their activities are carried out in accordance with the applicable regulatory framework.

GRI 306-3, SASB EM-MM-150a.7

The Environmental Officer is responsible for collecting and recording waste data from all workshops on a monthly basis. This data is maintained in a centralized database managed by the Environmental Department, allowing for accurate tracking of waste flows and ensuring that all handling processes meet regulatory and internal standards.

In 2024, the Company generated a total of 36,943,886 metric tons of waste, comprising 19,153,967 metric tons of hazardous waste and 17,789,918 metric tons of non-hazardous waste. It is worth mentioning that the hazardous waste level decreased by about 10% compared to the previous year. However, the total amount of waste has increased due to a rise in non-hazardous waste.

Waste generation by types (in metric tons)

Waste type	2023	2024	Percentage change
Hazardous waste	21,232,189	19,153,967	-9.79%
Non-hazardous waste	15,152,336	17,789,918	17.41%
Total waste	**36,384,525**	36,943,886	**1.54%**

2,086 metric tons of waste were successfully diverted from final disposal through recovery operations, including both recycling and preparation for reuse, reflecting the Company's ongoing efforts to reduce environmental impact.

Waste diverted from disposal (in metric tons)

Waste type	2023	2024	Percentage change
Hazardous waste:	**1,733.55**	**1,887.31**	**8.87%**
Preparation for reuse	137.27	29.49	-78.52%
Recycling	1,596.28	1,858	16.38%
Non-hazardous waste:	**1,879.24**	**198.78**	**-89.42%**
Preparation for reuse	278.99	166.46	-40.33%
Recycling	1,600.25	32.32	-97.98%
Total	**3,612.80**	2,086.09	**-42.26%**

GRI 306-4

Hazardous waste continued to be managed primarily through landfilling and incineration, while non-hazardous waste was directed mainly to landfills, with only minimal incineration. In response to these trends, the Company is actively investigating innovative waste treatment technologies to minimize landfill dependency further and improve overall waste diversion rates.

Looking ahead, the Company has outlined several main initiatives to improve its waste management performance. These include exploring options to reuse wood waste and evaluating the feasibility of recycling tires and other rubber materials. The focus is strongly on reducing waste at its source and encouraging material reuse whenever possible.

These initiatives demonstrate environmental responsibility and also contribute to achieving long-term operational efficiency. To support these efforts, the Company aims to increase its recycling rates by 2025 significantly.

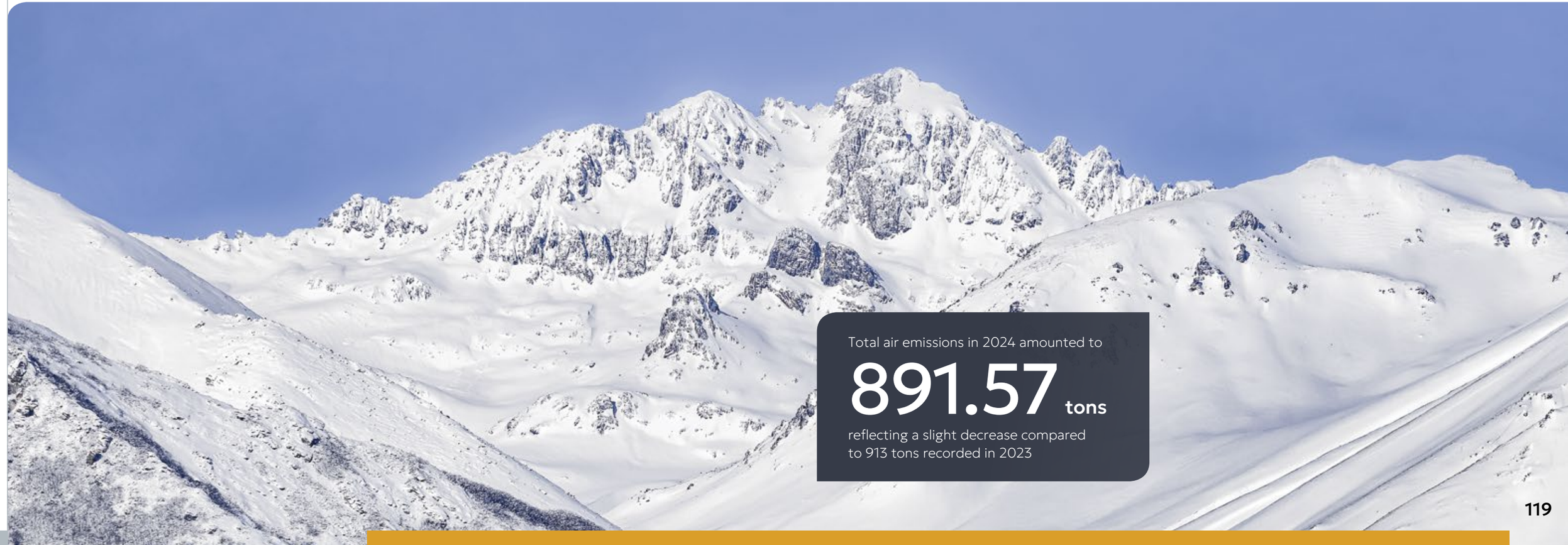
SASB EM-MM-150a.9

In 2024, a total of 12 incidents related to the handling of hazardous materials and waste were reported, according to the Environmental Department's database. In accordance with regulatory obligations, the Sustainable Development Directorate reported all incidents to the Syunik Regional Environmental Protection and Mining Inspection Body of the Republic of Armenia. These incidents, while varied in nature and impact, were addressed promptly with a focus on containment, remediation, and prevention of recurrence.

Air Emissions Control: Emission Reduction Initiatives: Enhancing Workplace Safety

GRI 3-3

ZCMC has been actively working to improve air quality and reduce emissions across its operations. A key priority has been creating a safer and healthier workplace by developing solutions aimed at upgrading aspiration (air extraction) systems at production sites. We have also continued to modernize our vehicle fleet to help lower emissions from the Company's transportation.



Total air emissions in 2024 amounted to

891.57 tons

reflecting a slight decrease compared to 913 tons recorded in 2023

In 2024, dust control remained a central focus of our operations. A dedicated team is responsible for overseeing and upgrading the aspiration systems, particularly at the Primary crusher, where dust is effectively captured and reintegrated into the enrichment process. The Environmental Department collaborates closely with this team to expand and implement similar systems across other operational sites.

Air emissions are monitored in accordance with our Air Quality Management Plan and Pollution Prevention Management Plan, both of which are overseen by the Sustainable Development Director and the Environmental Department. These plans ensure that emissions are monitored regularly and that prompt action is taken if any issues arise.

To strengthen our monitoring efforts, we increased the number of air monitoring points to 12 in 2024. These monitoring points provide real-time data on air quality across various site locations. The information is stored in a central system, which supports our efforts to maintain strong environmental performance.

GRI 305-7, SASB EM-MM-120a.1

A combined approach was used to collect and calculate data on air emissions. In some cases, emissions were measured directly, while in others, engineering-based calculation methods were applied. Normative permissible thresholds were also considered in accordance with local regulations. As a standard practice, the Company uses local emission standards and the limits specified in its air emission permit as the primary reference, ensuring full compliance with national requirements before assessing consistency with relevant international emission limits or guidelines where feasible.

According to our Annual Monitoring Report, total air emissions in 2024 amounted to 891.57 tons, representing a slight decrease from the 913 tons recorded in 2023.

Volume of pollutant emissions into the atmosphere (in metric tons)[36]

Substance	2023	2024	Percentage change
Nitrogen oxides (NOx)	59.63	53.96	-9.51%
Sulfur dioxide (SOx)	0.09	0.06	-33.33%
Persistent organic pollutants (POPs)	0	0	0.00%
Volatile organic compounds (VOCs)	0.08	0.08	0.00%
Hazardous air pollutants (HAP)	0.0000064	0.0000038	-40.63%
Particulate matter (PM)	694.47	684.37	-1.45%
Carbon monoxide (CO)	154.35	150.30	-2.62%
Other polluting emissions[37]	4.31	**2.80**	-35.03%

[36] We currently do not have data showing how these emissions are distributed by individual sites. These numbers are calculated based on the volume of ore we process.

[37] Mercury (Hg) and lead (Pb) are not being monitored.

Tailings Infrastructure and Monitoring: Strengthening Safety Systems and Aligning with Global Standards

GRI 3-3, SASB EM-MM-540a.1, EM-MM-540a.2, EM-MM-540a.3

At ZCMC, responsible TSF management remains a top priority. Our focus is on safety, environmental protection, and steadily aligning with global best practices. A key part of this work centers around the Artsvanik Tailings Storage Facility, which plays a vital role in our operations and long-term sustainability goals[38].

Located about 5 kilometers northeast of Kapan, in the lower gorge of the Artsvanik River, this facility has been in operation since 1977. It was built using the upstream dam method and was initially- designed to hold up to 377 million cubic meters of tailings, with an approved operational limit of 325 million cubic meters.

Between 2022 and 2024, ZCMC carried out technical upgrades to improve dam safety. This included building a new drainage system to reduce water pressure within the dam, which helps strengthen its structure. In 2023–2024, ZCMC worked with the "Institute of Mountain Metallurgy" CJSC to assess pipelines, tunnels, and bridges connected to the TSF. The assessment identified areas for further reinforcement.

We have also made significant progress in strengthening our monitoring system. To date, 49 manual piezometers, 10 online piezometers, 24 deformation indicators, and several vibration sensors have been installed, providing continuous updates on groundwater conditions, structural movements, and seismic activity. Monitoring results indicated a 1 to 1.5-meter decrease in surrounding groundwater levels due to the volume of water pumped from the installed wells, demonstrating that the wells and pumps are operating effectively.

Looking ahead, we plan to install additional seismic sensors during 2024–2025 to strengthen further our early warning capabilities in the event of earthquakes. To support dam stability and prevent erosion, we have also planted vegetation, including polychaete herbs and various tree species, while relocating specific drainage infrastructure to more secure locations.

Above all, prioritizing safety and stability within our environment, we have initiated a comprehensive stability assessment, which was also reported in 2023. The evaluation combines multiple investigations, which are planned to be fully covered at the beginning of 2026. This project is being developed with the active engagement of our stakeholders, particularly in the Kapan community. We design solutions that meet not only the facilities' needs but also the community's needs.

We understand that TSF has an impact on nearby communities through limitations to land access. To help address this, ZCMC provides monthly financial support to residents of five surrounding villages. We also prioritize hiring local workers for TSF-related jobs, thereby supporting the regional economy.

We have committed to fully aligning with the Global Industry Standard on Tailings Management by 2028.

[38] ZCMC has completed the closure and rehabilitation of three older tailings sites Darazami, Voghji, and Pukhrut. These facilities have been officially handed over to the Government of the Republic of Armenia, and ZCMC no longer monitors or maintains them.

Biodiversity Management and Ecosystem Restoration: Aligning Operations with Ecological Standards and International Frameworks

GRI 3-3, 304-1, 304-2, 304-3, 304-4

Protecting biodiversity remains a core pillar of ZCMC's environmental strategy. In 2024, we continued to implement the Ecosystems and Biodiversity Management Plan, an integral component of our Environmental Management System. This plan, approved by the Company's General Director, is aligned with Armenian legislation on flora and fauna, IFC Performance Standard 6, the Bern Convention, the Red Book of Armenia, the IUCN Red List, and our biodiversity monitoring reports.

Operational Context and Ecological Sensitivity

The Company's area is extensive, featuring an elevation range of approximately 1,400 meters. This territory, along with its surrounding areas, is traversed by three major and several smaller surface water streams. These characteristics classify the area as a combination ecosystem, comprising both terrestrial and freshwater elements.

ZCMC's production footprint includes the open pit, production and auxiliary facilities, and TSF. The area surrounding the open pit is of particular ecological importance and is situated just 1,300 meters south of Arevik National Park. This park represents a biodiversity-rich protected landscape that is home to endemic and migratory species, and is designated as a critical bird habitat along established migration routes.

To monitor potential interactions with local wildlife, photo traps were set up at four key sites within the mine's buffer zone. These devices consistently record animal activity, helping build a long-term biodiversity database.

However, the current biodiversity assessments do not yet measure population trends or identify species-specific impacts. To fill these gaps, a more detailed study was initiated in 2024, designed to meet the international EBRD biodiversity standard.

The identified habitats help us understand the scope of our impact and guide our efforts to reduce any possible adverse effects on biodiversity. At this stage of the study, the accurate number of species and animals has not yet been identified in compliance with both the International Union for Conservation of Nature (IUCN) Red List and the national list of protected species within the Company's production footprint.

Annual biodiversity monitoring continues to track the presence of flora and fauna, with a special focus on the Red Book and endemic species. Notable species observed in previous years, such as Campanula zangezura, Carex oligantha Steud, Telescopus fallax, and Vipera raddei, were also recorded in 2024, indicating relative habitat stability.

Although efforts continue, fully understanding and managing biodiversity impacts still present several challenges, such as.

- The lack of available data on biodiversity within Arevik National Park and its direct interface with ZCMC's operations.
- The effects of pollutants on local biodiversity have not yet been assessed.
- Potential impacts on nocturnal and migratory species from noise, light, and infrastructure development (particularly roads) have not been quantified.
- While groundwater monitoring has been conducted in the open-pit area, its implications for biodiversity are planned to be analyzed.

These knowledge gaps limit our ability to quantify biodiversity losses, benefits, or the reversibility of impacts. However, with the biodiversity study launched in 2024 and updated monitoring tools now in place, we anticipate gaining more detailed ecological insights for the 2025 reporting cycle.

Environmental Restoration and Closure Planning: Integrating Restoration with Active Operations and Long-Term Environmental Goals

GRI 3-3, 304-3

As part of our ongoing commitment to responsible mining and environmental sustainability, ZCMC continues to integrate progressive land rehabilitation into daily operations, ensuring that ecological restoration occurs alongside active mining activities. Our recultivation efforts are carried out at our own expense and following national regulations, with financial contributions also made to the state budget for reclamation purposes.

Restoration and Conservation Initiatives

In 2024, ZCMC invested about

$53,457

in biodiversity assessment studies

and

$19,092

for acquiring new restoration resources

Restoration of 21.6 hectares of land, including:

20 hectares near the Artsvanik TSF

3,038 trees

were planted

1.6 hectares at the Darazami waste rock dump, where

120 trees

(60 oaks and 60 ash) were planted as part of progressive reclamation efforts

Planting a total of

3,158 trees

comprising both native and resilient species

Sowing korngan seeds in the Artsvanik TSF area and Darazami WRD area as part of a botanical recultivation initiative aimed at supporting soil recovery and vegetation reestablishment.

Restoration was conducted in full compliance with national regulations, including:

- RA Government Decision No. 1643-N (2017) on soil reclamation.
- Order of the Minister of Environment No. 365-N (2012) on cost estimation and indexing for reclamation.
- RA Government Decision No. 1848-N (2021) on biological rehabilitation guidelines.

The restoration efforts represent continued progress toward our goal of enhancing biodiversity and rehabilitating disturbed ecosystems, in parallel with ongoing operations.

Mine Closure

The Company remains committed to aligning its mine closure planning with international best practices, as outlined in its Mine Closure and Rehabilitation Plan, which was developed in 2016. A key milestone in 2024 was the completion of a closure cover optimization study for the Artsvanik TSF. The study recommends implementing a 0.5-meter soil layer over a capillary break design, aimed at minimizing seepage and enhancing long-term environmental stability under various climatic conditions. This cover is being used for the progressive recultivation of the TSF embankment. Additionally, as mentioned earlier, we are also undertaking progressive recultivation on the Darazami dam.

To date, approximately USD 10.37 million has been allocated for mine closure and rehabilitation efforts, covering land restoration, infrastructure removal, and ongoing environmental monitoring. Restoration activities include landform re-contouring, native vegetation re-establishment, management of surface water runoff, and long-term monitoring of soil and water quality to ensure ecological resilience.

Progress is tracked through key performance indicators such as restored land area, vegetation survival rates, and improvements in water and soil quality.

Climate Change

128 — Climate Change Governance: Upholding Transparency and Accountability in Addressing Climate Challenge
130 — Climate Change Strategy: Advancing Resilience and Opportunity Through Strategy Development
137 — Climate Risks Management: Targeting Lower Carbon Footprint and Enhancing Resilience to Climate-related Risks
139 — GHG Emissions: Targeting the Improvement in Production Efficiency

Climate Change Governance: Upholding Transparency and Accountability in Addressing Climate Challenge

GRI 3-3, SASB EM-MM-110a.2, IFRS2 5-7

ZCMC acknowledges the importance of strengthening the strategy for managing climate-related risks and reducing Greenhouse Gas Emissions (GHG), aligning efforts with international standards, including the Greenhouse Gas Protocol and TCFD recommendations.

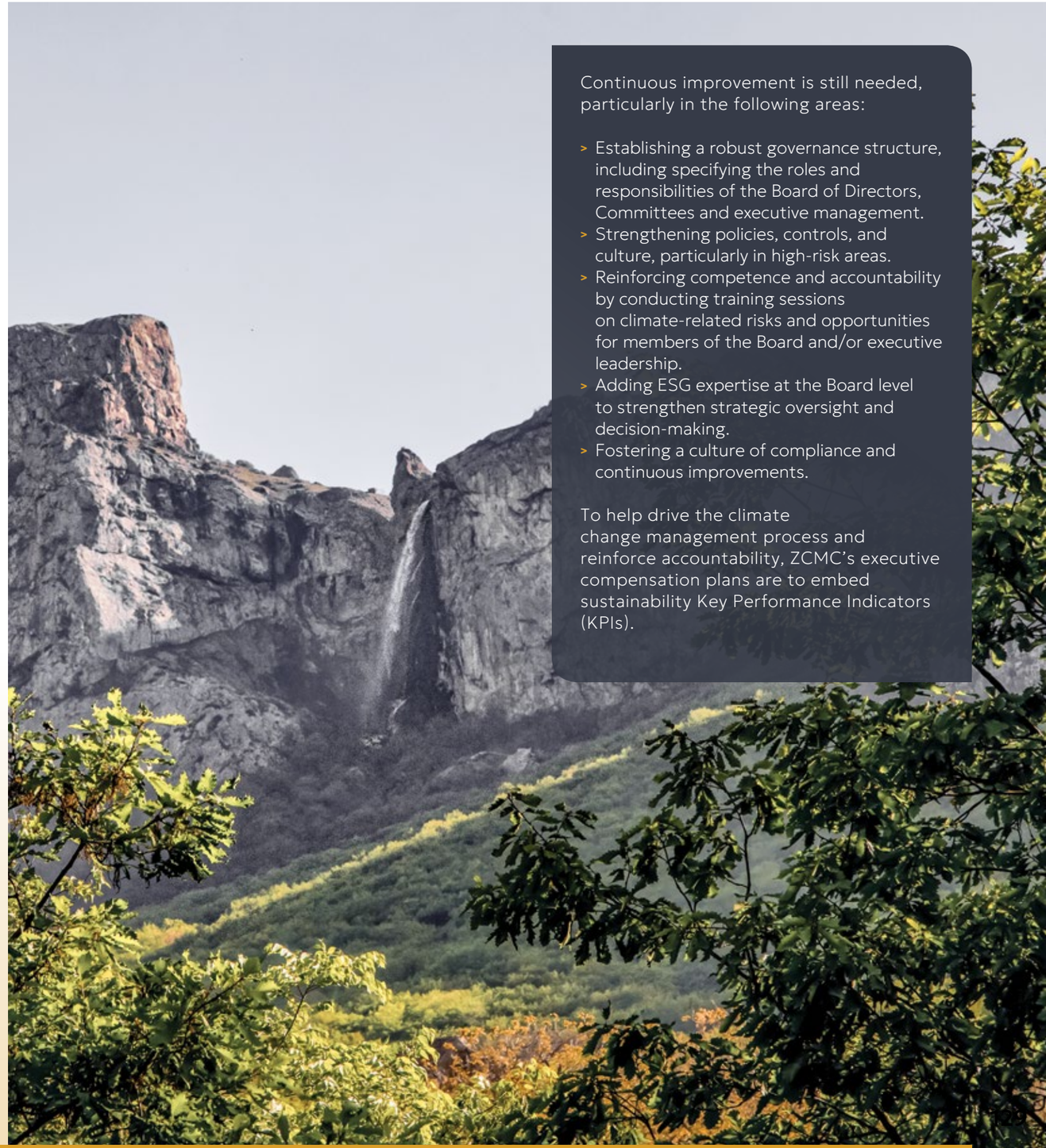
In November 2024, the Board of Directors approved approved the Company's Climate Change Policy. While we recognize that practical steps and an action plan on climate change are necessary, this Policy marks a significant step in our public commitment to minimizing climate impact, enhancing resilience, and integrating sustainability across all levels of our operations. It complements our Environmental and Biodiversity Policies and forms a core part of our ESG governance structure.

The following documents guide and govern climate change — related efforts at ZCMC:

1. Climate Change Policy
2. TCFD report and recommendations

ZCMC's Board of Directors and senior management are responsible for setting the overall strategic goals for decarbonization and resilience. This governance framework ensures that climate objectives are integrated into broader corporate strategies and risk management processes. For this purpose, the Sustainable Development Directorate, responsible for overseeing the Company's climate change initiatives, plans to develop a Climate Change Strategy with a short-term, medium-term, and long-term perspective, which will serve as a cornerstone for setting and achieving specific targets.

ZCMC recognizes that effective climate change management requires strong governance at the highest level. While the Company's leadership and Board of Directors have made progress in recent years by enhancing oversight structures, policies, and accountability mechanisms, we acknowledge that this remains an ongoing journey.



Continuous improvement is still needed, particularly in the following areas:

- Establishing a robust governance structure, including specifying the roles and responsibilities of the Board of Directors, Committees and executive management.
- Strengthening policies, controls, and culture, particularly in high-risk areas.
- Reinforcing competence and accountability by conducting training sessions on climate-related risks and opportunities for members of the Board and/or executive leadership.
- Adding ESG expertise at the Board level to strengthen strategic oversight and decision-making.
- Fostering a culture of compliance and continuous improvements.

To help drive the climate change management process and reinforce accountability, ZCMC's executive compensation plans are to embed sustainability Key Performance Indicators (KPIs).

Climate Change Strategy: Advancing Resilience and Opportunity Through Strategy Development

IFRS 2 — 14(a), IFRS 2 11-12

13 CLIMATE ACTION

Climate change is a defining global challenge that poses significant risks and opportunities for the Company across all sectors.

It impacts physical operations, supply chains, regulatory landscapes, and stakeholder expectations, requiring the Company to rethink how it creates long-term value. Recognizing the urgency and complexity of the issue, the Company is committed to integrating climate considerations into its strategic planning, risk management, and operational decision-making processes. This approach not only enhances business resilience but also positions the Company to contribute meaningfully to the global transition toward a low-carbon, climate-resilient economy.

ZCMC is developing a comprehensive Climate Strategy that will guide its long-term approach to managing climate-related risks, seizing low-carbon opportunities, and aligning global climate goals. Despite the absence of a formal document at this stage, ZCMC employs a comprehensive approach to identifying and assessing climate-related issues that could impact its profitability, growth, and stakeholder interests. By leveraging a broad range of data sources, including historical performance, current operational metrics, and forward-looking climate scenarios, ZCMC ensures a robust understanding of potential risks and opportunities.

Information sources:

1. ZCMC utilizes historical production data and resource consumption patterns to understand past trends and inform future strategies.
2. Market forecasts for energy and carbon credit pricing are analyzed to anticipate financial impacts and inform investment decisions.
3. Climate change forecasts are employed to assess the likelihood of impact and possible adaptation plans.

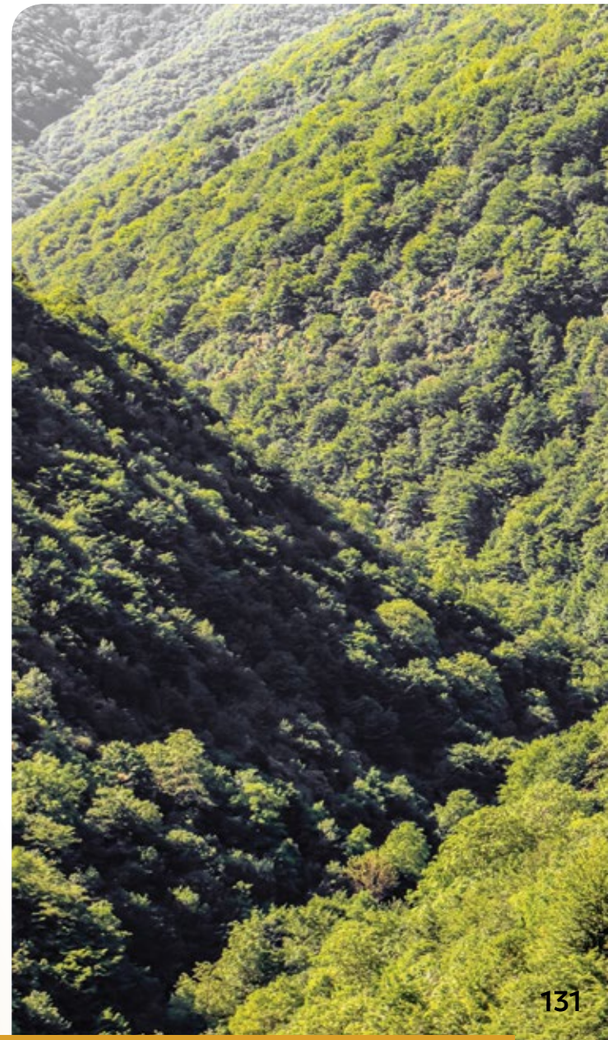
Stakeholder Engagement:

- ZCMC collaborates with government authorities and local communities to anticipate water usage regulations and mitigate potential conflicts, ensuring sustainable resource management.
- The Company maintains ongoing dialogue with suppliers and partners to assess the most effective channels for addressing decarbonization trends and enhancing supply-chain resilience, thereby fostering strong relationships and shared sustainability goals.

ZCMC's climate strategy will embed global and national goals, particularly Armenia's Nationally Determined Contributions (NDCs). The Company employs scenario analyses consistent with international frameworks, notably aligning with the Paris Agreement's goals of limiting global warming to well below 2°C, preferably 1.5°C. Climate scenarios, including Net Zero 2050 pathways, underpin ZCMC's decarbonization and adaptation strategy.

7 AFFORDABLE AND CLEAN ENERGY

The table below highlights the Company's short- and long-term goals and illustrates the progress achieved to date for the emission reduction and mitigation measures.



Short — Term Goals	Long — Term Goals
Energy Efficiency Progress: › **Infrastructure upgrades**: During the reporting period ventilation and aspiration systems across operational sites were monitored and audited to optimize energy efficiency and reduce operational energy use[39]. › **Fleet electrification**: The Company is gradually replacing conventional vehicles with electric vehicles (EVs) and promoting eco-driving practices among its workforce to reduce fuel consumption and emissions. › **On-site solar facilities**: ZCMC is planning to reduce its reliance on traditional fossil fuels by developing a strategy on installing on-site solar facilities. **Water Efficiency** Progress: › **Thickener**: In 2024, the Company initiated a comprehensive project — the installation of a thickener — which will enable the reuse of industrial water. **Infrastructure Resilience** Progress: › **Climate risk assessment**: The Company has conducted climate risk assessments to evaluate the potential impacts of extreme weather events on its infrastructure. Special attention is given to the development of seismic-resistant tailings storage facilities to mitigate earthquake risks.	**Renewable Energy Integration** Progress: › **Wind energy**: Under this initiative, our Company, with the financial support of the Government of Japan, plan to install four wind turbines within the area of the Company's TSF which must be confirmed based on the feasibility study - expected to be completed in 2025. **Carbon Offsetting** Progress: › **Reforestation and landscaping**: ZCMC currently has a carbon offsetting initiative that includes actions such as reforestation and landscaping. › **Solar energy**: For the development of a large-scale solar power plant, ZCMC carried out a series of stakeholder consultations to align the project with regional needs and conditions, ensuring its relevance and effectiveness. During the reporting period, solar power plants and solar water heaters were installed in Syunik Marz. These initiatives are also planned for 2025-2026. For details, please refer to the section Local Communities. › **Carbon markets**: As part of its broader climate strategy, the Company is actively assessing opportunities to engage in both national and international carbon markets that could support the Company's efforts to offset emissions and contribute to global climate goals. At the same time, the Company is monitoring the development of Armenia's carbon pricing possibilities, which is expected to play a key role in shaping the country's future approach to emission reductions.

[39] A defined portion of annual capital expenditure is dedicated to energy-efficiency upgrades, modern equipment, and research and development in low-emission technologies.

While ZCMC remains committed to the Company's goals through a range of targeted initiatives, it also acknowledges several risks that could hinder full achievement of these objectives.

Financial constraints

The high capital investment required for low-carbon technologies may limit the speed and scale of implementation.

Regulatory uncertainty

Potential changes in national and international carbon pricing and emissions regulations may impact the cost-effectiveness of GHG reduction strategies.

Technological barriers

The integration of renewable energy into mining operations, particularly in remote and complex environments, remains a technical challenge that requires innovative solutions.

Navigating Climate-Related Risks and Opportunities for Long-Term Resilience

IFRS 2 — 10(a), IFRS 2 — 13(a), IFRS 2 — 14 (a), IFRS 2 — 8, 9

The proactive approach to managing climate-related risks and opportunities underscores ZCMC's commitment to sustainable development and resilience in the face of environmental challenges. In pursuit of sustainable and resilient operations, we have conducted a thorough assessment of climate-related risks and opportunities that are critical to its operational performance and strategic decision-making. ZCMC has identified primary climate-related risks and opportunities that have the potential to significantly influence operational performance, strategic decisions, and long-term value creation.

Physical Risks

Water Scarcity and Operational Continuity

Ore processing at ZCMC is heavily water-intensive, making the Company vulnerable to droughts, climate-induced changes in precipitation patterns, and competing regional water demands. Reduced water availability could disrupt operations or necessitate expensive mitigation strategies.

In response to these risks, ZCMC plans significant investments (approximately USD 35 million) in water recycling technologies, notably the installation of a thickener system to minimize freshwater usage. These improvements not only reduce climate-related operational risks but also have the potential to unlock long-term savings, enhance operational efficiencies, and foster positive stakeholder relations. Construction on the thickener system is planned for the year 2025. This timeline reflects ZCMC's proactive approach to addressing water scarcity challenges and underscores its commitment to sustainable resource management.

In the medium to long term, more frequent droughts or increased competition for water resources could lead to higher operating costs and necessitate additional capital expenditures for alternative water sources, such as advanced recycling technologies. Enhanced water-management practices may emerge as a strategic advantage, helping maintain stable production levels even under more severe climate conditions.

Cross-departmental task forces annually review water-related capital budgets to ensure operational continuity under varying climatic conditions.

Transition Risk

Heavy Reliance on Fossil Fuels

The first transition risk involves increases in energy costs and supply reliability issues. ZCMC's operations, particularly mining and ore processing, are energy-intensive and heavily dependent on grid electricity, including nuclear and fossil fuels such as diesel and natural gas. Fluctuations in energy prices, potential carbon pricing mechanisms, and broader energy market volatility present both a cost risk and an opportunity for energy-efficiency investments.

To address these challenges, ZCMC is committed to actively pursuing alternative energy sources. This includes the installation of a solar power plant on-site, procurement of green-certified electricity where viable and available, as well as pilot programs for fleet electrification, gradually replacing light-duty vehicles with electric or hybrid models. A pilot program for electric light-duty vehicles has demonstrated a modest decline in fuel consumption for the tested fleet segment.

These initiatives aim to mitigate cost volatility and align with emerging trends in low-carbon energy, thereby enhancing both sustainability and economic resilience.

Shifts in Preferences Toward Low-Carbon Supply Chains

Understanding the interconnected nature of emissions throughout the value chain is crucial for effective climate action. ZCMC's Scope 3 emissions — those resulting from activities outside its direct control—mainly consist of the Scope 1 and Scope 2 emissions from its suppliers. Conversely, ZCMC's own Scope 1 and Scope 2 emissions are included in the Scope 3 inventories of its downstream partners. This mutual dependence highlights shared responsibility throughout the entire value chain and necessitates coordinated efforts to achieve significant emissions reductions.

Currently, ZCMC's Scope 3 emissions total approximately 946,566 tCO2-eq., attracting increasing scrutiny from major downstream partners. Many of these partners are introducing stricter sustainability requirements across their supply chains, placing greater expectations on suppliers like ZCMC to demonstrate progress in reducing their carbon footprint. At the same time, rising pressure from international markets regarding climate performance poses potential risks to ZCMC's long-term commercial relationships. These developments reinforce the strategic importance of investing in low-carbon technologies, enhancing operational efficiency, and strengthening supply chain due diligence. Amid these challenges, ZCMC also faces a significant opportunity: to position itself as a lower-carbon copper and molybdenum supplier in an evolving global marketplace that increasingly values responsible sourcing and 'green metals' in support of decarbonization goals.

Emerging Opportunities Through Innovation and Collaboration

ZCMC recognizes significant alignment with climate-related opportunities, including increased global demand for copper and molybdenum driven by the clean energy transition, which encompasses renewable energy technologies, electric vehicles, and infrastructure. Opportunities also exist in energy efficiency, renewable energy investments, and potential collaboration with the Government of the Republic of Armenia to expand the renewable energy sector[40].

Climate-Related Impacts Across Operations and Value Chain

IFRS 2 — 13b

ZCMC operations and broader value chain influence both upstream and downstream activities.

Mining Operations

Located in Syunik Marz, the Kajaran open pit mine is characterized by high energy and water demands, making its operations particularly sensitive to changing precipitation and temperature patterns that may affect long-term stability. The mobile fleet, comprising large-scale trucks and loaders, predominantly uses diesel, representing a significant source of Scope 1 emissions. Additionally, stationary equipment, such as boilers and industrial processes that rely on natural gas, significantly contributes to ZCMC's direct emissions profile.

Processing and Beneficiation

The Processing plant is a primary area of emissions, accounting for nearly 90% of Scope 2 emissions due to electricity consumption, as per the GHG inventory. Crushing and transportation workshops are additional hotspots for energy use and associated emissions. The ore processing circuit's reliance on a continuous water supply means that climate-induced variability in water availability poses direct operational and financial risks.

[40] Quantification of these alignments in terms of percentage or amount will be detailed as part of ongoing strategic evaluations.

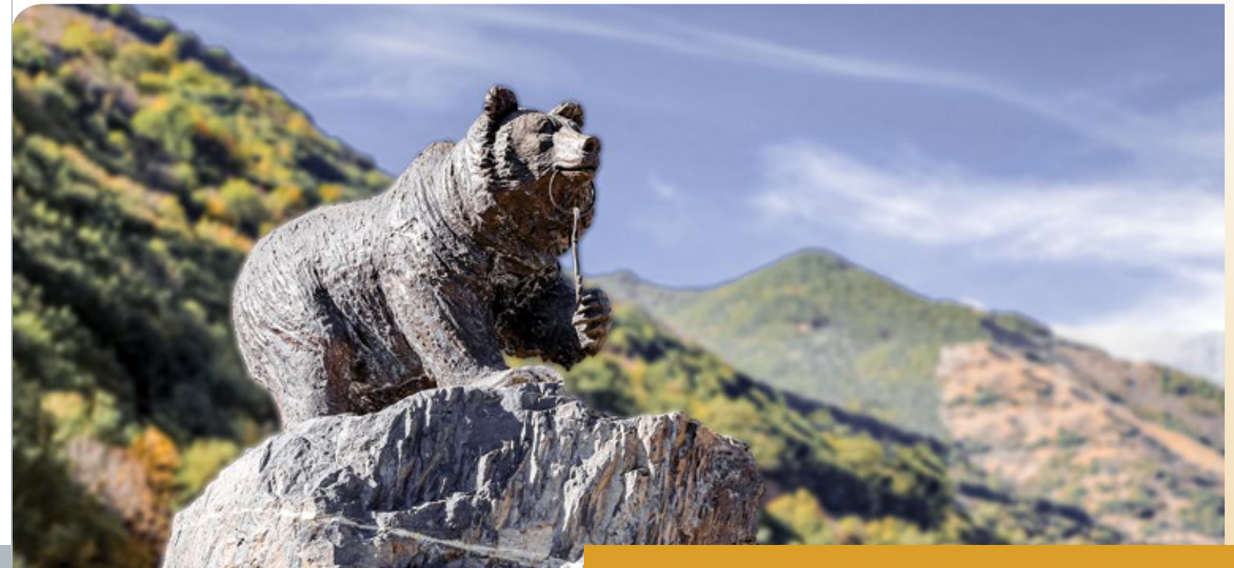
Downstream Value Chain

Downstream logistics, categorized under Category 9 of Scope 3, account for approximately 26% of total Scope 3 emissions. Transporting copper concentrate to global smelters is particularly carbon-intensive, mainly when relying on road freight or shipping with high emissions profiles. The processing of sold products, categorized under Category 10, is the second most significant contributor to Scope 3 emissions, accounting for 28%. This underscores the risk that end-users, particularly in regions with stringent climate policies, may increasingly demand lower-carbon concentrate or shift to suppliers with more sustainable footprints.

Suppliers, Materials, and Services

Purchased goods and services, also capital goods categorized under Scope 3, Category 1 and 2, account for approximately 18% of total Scope 3 emissions. Supply chain partners face mounting pressure to decarbonize the production and distribution of key inputs, such as reagents and spare parts. Fuel and energy-related activities, under Scope 3, Category 3, also generate indirect emissions through the extraction, refining, and transportation of diesel, natural gas, and electricity.

By understanding these climate-related impacts across its operations and value chain, ZCMC aims to be better positioned to develop strategies that mitigate risks and capitalize on opportunities, thereby reinforcing its commitment to sustainable development and operational excellence.



Climate Risks Management: Targeting Lower Carbon Footprint and Enhancing Resilience to Climate-related Risks

Dual Approach to Risk Management, Addressing Physical and Transition Risks for Sustainable Mining Operations

IFRS 2 — 10(b)

ZCMC systematically classifies its principal risks into two key categories: physical risks and transition risks. This classification is essential for understanding the diverse challenges that could impact the Company's mining operations and strategic planning.

Climate-related risks were assessed using the Company's established risk matrix methodology, which evaluates risks based on their likelihood of occurrence and potential impact on operations, assets, and stakeholders. This approach enables a structured and consistent evaluation of both physical risks and transition risks. The Company ensures that these factors are systematically identified, prioritized, and addressed in strategic and operational planning.

Physical Risks encompass rising temperatures, water scarcity, and the increased frequency of extreme weather events, such as droughts. These factors can directly affect the stability and efficiency of ZCMC's mining operations, posing significant challenges to maintaining consistent production levels.

Transition Risks[41] involve the potential impacts of energy cost escalation and carbon credit implications. While the immediate focus remains on physical risks like water stress, ZCMC also considers the broader impact of future regulatory frameworks and market pressures, such as carbon taxes, tighter emission regulations, market competitiveness impacts (driven by consumer preferences and carbon border adjustments), and reputational risks. These could materially affect the costs associated with diesel and natural gas consumption, necessitating strategic adjustments to ensure long-term operational viability. By identifying and categorizing these risks, ZCMC is better equipped to develop targeted strategies that address both immediate and future challenges, reinforcing its commitment to sustainable development and operational excellence.

[41] Comprehensive financial quantification and scenario-based sensitivity analyses of the transition risk are in progress.

Navigating Short, Medium, and Long-Term Challenges for Sustainable Operations

IFRS 2 — 10(c) (d)

ZCMC strategically aligns its planning with multi-year capital investment cycles and established industry norms for mining operations. This approach ensures that the Company remains agile and responsive to both immediate and long-term challenges within the mining sector. In addition, drawing on its internal planning processes and industry-specific climate risk assessments, ZCMC has outlined a strategic direction for managing climate-related risks.

Short-Term Focus (1–3 Years)

In the short term, ZCMC concentrates on aligning its climate and operational priorities with annual budgeting and near-term planning cycles. This period is critical for addressing immediate operational needs and maintaining the Company's ability to respond quickly to shifting market conditions and evolving regulatory requirements.

One of the key short-term challenges identified is the year-to-year variability in water availability. Local drought cycles and abrupt regulatory changes impacting water allocations pose immediate operational risks. These factors are closely monitored to ensure stability in production and resource planning.

Additionally, short-term volatility in input costs, such as sudden spikes in diesel or gas prices, is recognized as another significant risk during this timeframe.

Medium-Term Focus (3–7 Years)

The medium-term horizon, spanning three to seven years, encompasses the typical life cycle of infrastructure upgrades, such as major plant and equipment enhancements, as well as mid-range strategic objectives. During this period, ZCMC prioritizes investments that improve operational efficiency and advance sustainability, ensuring the Company remains competitive and resilient amid evolving industry dynamics.

A key focus in the medium term is the trajectory of energy prices. Sustained upward pressure on prices, or policy-driven carbon costs associated with fossil fuels, could increasingly shape capital budgeting decisions. To proactively manage these risks, ZCMC is advancing projects, including a strategy for transitioning to solar power and water infrastructure improvements. Notably, the installation of a thickener, planned for 2025-2026, aligns with this timeline and is expected to deliver both risk mitigation benefits and operational efficiencies.

Long-Term Focus (Beyond 7 Years)

In the long term, ZCMC's strategic planning takes into account the potential for major expansions, evolving regulatory landscapes, and broader industry transformations. This horizon enables the Company to anticipate and prepare for fundamental shifts in the mining sector, including technological innovation, changing global resource demand, and sustainability-driven market expectations.

ZCMC recognizes that continued reliance on fossil fuels may pose substantial cost and compliance risks in the future, particularly if global and local energy transitions accelerate. Expanded carbon pricing mechanisms, stricter emissions regulations, or both could drive this. In parallel, long-range climate models suggest that water scarcity may become more pronounced over time, potentially necessitating significant technological investments to secure sustainable water resources and maintain operational continuity.

By aligning its strategic planning across short-term, medium-term, and long-term investment horizons, ZCMC is well-positioned to meet its long-term objectives. This structured approach enables the Company to effectively address both immediate and emerging climate-related challenges, reinforcing its commitment to sustainable development and long-term resilience.

GHG Emissions: Targeting the Improvement in Production Efficiency

GRI 3-3, GRI 305-1, GRI 305-2, GRI 305-3, IFRS 2 — 14(a)(v), IFRS 2 — 14(c)

ZCMC is committed to meeting its climate-related targets, with a primary focus on reducing greenhouse gas (GHG) emissions[42].

Primary objectives include mitigating operational emissions (Scopes 1 and 2), engaging suppliers in Scope 3 reductions, and aligning with internationally recognized decarbonization pathways over the medium and long term.

ZCMC continuously invests in strengthening its GHG data collection and tracking systems. Since the publication of its first comprehensive Scope 1, 2, and 3 GHG inventory in 2022[43], the Company has made notable progress in refining its methodologies. These improvements include more precise tracking of vehicle-level fuel consumption and equipment-level energy use, contributing to greater accuracy and reliability of emissions data. This ongoing commitment to data integrity supports informed decision-making and reinforces ZCMC's broader climate strategy.

The internal documents guiding ZCMC's emissions management are:

- Air Quality Management Plan
- Pollution Prevention Management Plan
- Normatives of maximum permissible emissions/ concentration of harmful substances.

The base guideline for inventories of GHG emissions and calculation is the Corporate Accounting and Reporting Standard which comprises two separate but linked standards:

- GHG Protocol Corporate Accounting and Reporting provides a step-by-step guide for companies to use in quantifying and reporting their GHG emissions.
- GHG Protocol Project Quantification Standard, a guide for quantifying reductions from GHG mitigation projects.

ZCMC conducts annual reviews that include benchmarking against industry peers, verifying data quality, and identifying opportunities for operational and strategic improvements.

Total GHG emissions rose to 1,258,490 metric tons of CO^2 equivalent in 2024, marking a 17.51% increase from the 2023 level of 1,070,988 metric tons.

Scope 3 emissions, representing indirect emissions from activities across the value chain, accounted for the largest share of total GHG emissions in both reporting years. A significant share of the increase in GHG emissions is also attributed to Scope 3 GHG emissions. In 2024, Scope 3 emissions totaled 946,566 metric tons of CO_2 equivalent, representing a 23.27% increase from 767,857 metric tons in 2023.

[42] ZCMC tracks overall emissions using an absolute GHG emissions metric (tCO_2-eq.), supplemented by intensity metrics (e.g., tCO_2-eq. per tonne of concentrate).

[43] GHG inventory was benchmarked against reputable frameworks such as the GHG Protocol and the IPCC Guidelines.

Amounts for types of greenhouse gas emissions (in metric tons of CO_2 equivalent)[44]

Indicator	2023	2024	Percentage change
GHG emissions (Scope 1)	76,218	82,370	8.07%
GHG emissions (Scope 2, market-based)	226,913	229,555	1.16%
GHG emissions (Scope 3)	767,857	946,566	23.27%
GHG emissions (Scope 1 + Scope 2)	303,131	311,924	2.90%
GHG emissions (Scope 1 + Scope 2 (marked-based) + Scope 3)	1,070,988	**1,258,490**	17.51%

GRI 305-1, SASB EM-MM-110a.1, GRI 305-3, GRI 305-2

Direct greenhouse gas emissions in metric tons of CO_2 equivalent[45]

Indicator	2023	2024	Percentage change
Total direct emissions (Scope 1) of GHGs	**76,218**	82,370	**8.07%**
Carbon dioxide (CO_2)	75,321	81,375	8.04%
Methane (CH_4)	29.8	30	-0.81%
Nitrous oxide (N_2O)	867.1	**966**	11.37%

The Scope 3 greenhouse gas emissions (in metric tons of CO_2 equivalent)

Indicator	2023	2024	Percentage change
Category 1. Purchased goods and services Category 2. Capital goods	121,907	**173,029**[46]	41.94%
Category 3. Fuel- and energy-related activities, not included in Scope 1 or Scope 2	91,930	**94,319**	2.60%
Category 4. Upstream transportation and distribution	29,317	**107,857**[47]	267.90%
Category 5. Waste generated in operations	-	**120**	n/a
Category 6. Business travel	252	**313**	24.21%
Category 7. Employee commuting	31,086	**58,268**	87.44%
Category 9. Downstream transportation and distribution	123,544	**247,242**	100.12%
Category 10. Processing sold products	369,821	**265,419**	-28.23%
Total other indirect emissions (Scope 3) of GHGs	**767,857**	**946,566**	**23.27%**

Downstream logistics (Category 9 of Scope 3) contributes around 26% of total Scope 3 emissions. Transporting copper concentrate to global smelters is particularly carbon-intensive, mainly when relying on road freight or shipping with high emissions profiles.

[44] Currently, ZCMC does not provide disaggregated Scope 1 and Scope 2 GHG emissions for other investees, associates, or joint ventures. Given evolving international standards and stakeholder expectations, ZCMC acknowledges the need to develop such disaggregation. Future ESG disclosures will include efforts to accurately attribute emissions across its non-consolidated investees, particularly focusing on associates or joint ventures.

[45] The calculation of seven GHGs covered under the Kyoto Protocol — carbon dioxide (CO_2), methane (CH_4), nitrous oxide (N_2O), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), sulphur hexafluoride (SF6), and nitrogen trifluoride (NF_3) are not available. The calculation has carried out only for emissions CH_4, CO_2 and N_2O.

[46] For this value, 118,793 tCO_2-eq is in the activity-based method, and 54,236 tCO_2-eq is in the spend-based method.

[47] The increase in emissions is attributable to the higher volume of products purchased during the reporting year compared to 2023, as well as the longer transport distances prior to delivery to the Company.

[48] For location-based Scope 2 emissions, grid electricity emission factors were taken from CDM Standardized Baseline ASB0038-2021: Grid emission factor for the electricity system of the Republic of Armenia. The emission factor on power sector emissions is 0.43596.

For market-based Scope 2 emissions, a supplier-provided emission factor was used.

Processing by partners (Category 10 of Scope 3) is the most significant contributor to Scope 3 emissions, accounting for 28%.

GRI 305-4

The total volume of indirect emissions (Scope 2) of greenhouse gases (location-based and market-based[48]) was 229,555 metric tons of CO_2 equivalent in 2024, representing a 1.16% increase from 2023.

Energy carriers, 2024

Indicator	GJ (2023)	GJ/ per ton of concentrate produced (2023)	GJ (2024)	GJ/ per ton of concentrate produced (2024)
Primary energy carriers (Fuels)	1,149,098	4.7	**1,229,768**	**6.7**
Secondary energy carriers	3,747,478	7.6	3,791,098	**20.6**
Total energy carriers	4,896,576	12.6	**5,020,866**	**27.2**

Intensity of greenhouse gas emissions per ton of concentrate produced, per sales, and per person, 2024

	GHG intensity		
Indicator	Per ton (tCO_2-eq./t)	Per sales (tCO_2-eq./EURO million)	Per person (tCO_2-eq./employee)
Scope 1	0.45	125	17.7
Scope 2	1.24	348	49.3
Scope 3	5.132	1,437	203.4
Scope 1 + Scope 2	1.69	473	67.0
Scope 1 + Scope 2 + Scope 3	**6.8**	**1,910**	**270.4**

Specific greenhouse gas emissions (carbon intensity) per revenue

Indicator	Unit of measurement	2023	2024	Percentage change
Total GHG emissions (Scope 1 and 2)	Metric tons of CO_2 equivalent	303,131	**311,924**	2.90%
Specific GHG emissions (Scope 1 and 2)	Metric tons CO_2 of equivalent / million USD	381	437	14.73%
Revenue	million USD	795.787	**713.087**	-10.38%

Landscaping programs

Due to the implemented landscaping mentioned in the Environmental Restoration and Closure Planning section of the current report, a total of 767.56kg CO_2 absorption has been calculated for 2024. With total GHG emissions (Scope 1 + Scope 2, market-based + Scope 3) amounting to 1,258,489.718 tCO_2-eq/year, the total CO_2 offset through the landscaping program represents approximately 0.00006099% of emitted CO_2.

From the results, it is evident that the following species are the most effective in carbon sequestration:

- Catalpa tall — 398.532kg
- Plantain poplar — 100.314kg
- Acacia — 81.066kg

These plant types demonstrated the highest capacity for CO_2 absorption among the species under the Company's care in 2024.

Appendices

Appendix 1: About this Report

GRI 2-2, GRI 2-3, GRI 2-4, GRI 2-5

This Sustainability Report aims to share ZCMC's performance results with a wide range of stakeholders. It highlights our contributions to the country's economic and social well-being, detailing the environmental aspects of our operations.

We are committed to clear and effective communication with our stakeholders, which is why we adhere to top global standards for sustainability reporting. This Report has been prepared in accordance with the GRI Sustainability Reporting Standards (GRI), and the guidelines of the Sustainability Accounting Standards Board (SASB). We also partially disclosed the climate-related disclosures aligned with IFRS S2, adopted for the first time in 2024.

For non-financial disclosures, the reporting boundaries include "Zangezur Copper Molybdenum Combine" CJSC, excluding its subsidiaries. Financial disclosures, however, cover both "Zangezur Copper Molybdenum Combine" CJSC and "Ler-Ex" LLC, as detailed in the audited consolidated financial statements.

ZCMC publishes its Sustainability Reports annually, aligning the reporting period with the financial year. This Report includes data for ZCMC from January 1 to December 31, 2024, and will be published in September, 2025.

No restatements have been made to the data from prior reporting periods unless otherwise indicated in the Report. The comparable data for 2022 can be found in our 2023 Sustainability Report.

We acknowledge the importance of independent verification, and this Report is currently undergoing external assurance. The Independent Assurance Report will be published separately in October 2025, and will be made available on the Company's website.

Appendix 2: Materiality Assessment

GRI 3-1

The Company regularly reviews and updates materiality assessments to reflect evolving business landscapes, emerging regulatory frameworks, and shifting stakeholder priorities. This iterative approach allows us to integrate material ESG topics into our overall risk management strategies and corporate governance frameworks, ensuring a proactive and responsive sustainability agenda.

The materiality assessment process for identifying these topics involved the following steps: compiling a list of potential material impacts, evaluating the significance of these impacts through an internal survey, and developing the final list of material topics.

In 2024, a comprehensive benchmark analysis was conducted to support the development of the 2024 Sustainability Report for ZCMC. This analysis focused on evaluating the structure of sustainability reports from 20 benchmark companies to identify best practices and industry standards.

Importantly, the material topics commonly addressed in sustainability reports have been assessed to ensure alignment with stakeholder expectations. By analyzing the approach taken by peer organizations and industry leaders, this benchmarking exercise provided insights into effective reporting methodologies, key thematic areas, and the level of transparency required for a robust and credible sustainability report.

The findings from this analysis served as a foundation for structuring the sustainability report in a manner that enhances clarity, relevance, and impact while also ensuring comprehensive coverage of the most material sustainability topics.

Building on the benchmark analysis and internal impact assessment, it was confirmed that the material topics identified in the previous sustainability report remain relevant for 2024. In addition, three new material topics were identified, bringing the total number of material topics to 22, as presented in the section below.

List of Material Topics

GRI 3-1

- Payments to governments
- Employee management
- Economic impact
- Business ethics, anti-corruption, and transparency (anti-corruption in 2023)
- Community engagement
- Water and effluents
- Critical incident management
- Public policy
- Responsible mining and land reclamation (closure and rehabilitation in 2023)
- Supply chain responsibility
- Employee health, safety, and well-being (employee safety in 2023)
- Freedom of association and collective bargaining
- Tailing storage facility
- Air emissions
- Climate change adaptation and resilience
- Waste
- Biodiversity
- Non-discrimination and equal opportunity
- GHG emissions
- Corporate governance (new for 2024)
- Energy efficiency and renewable energy (new for 2024)
- Innovation and digitalization (new for 2024)

Appendix 3[49]

Environmental topics

Materials

GRI 301-1

Non-renewable materials, 2024 (in metric tons)

Material	Weight
Ore	22,333,137.0
Natural Gas	4,059.9
Metallic Aluminium	2.5
Metallic Lead	0.2
Metallic Tin	0.0
Metallic Copper	141.1
Metallic Zinc	856.2
other metalic items Steel Items & Details	8,969.0
Balls for Grinder/Crusher	21,750.0
Liners (Metallic)	872.6
Oils	647.1
Lubricants	141.2
Sand/Stucco	675.9
Piller/Oily Wood	24.0
Babbit Alloy	8.0
Bronze Alloy	0.7
Soil (for Greenery Work)	40.0
Filter for Machines	6.4
Concrete	576.5
Explosives	3,953.9
Tyres	1,126.4
Electrodes for Welding	41.9
Rubber Conveyor Belts	91.3
Resin Items	128.5

[49] Minor differences (≤ 1) between component figures and their totals are due to rounding.

Non-renewable materials, 2024 (in metric tons)

Material	Weight
Adhesives/Glue	43.8
Paints	11.0
Plastic Materials	185.8
Batteries	4.0
Chemical Reagents for Flotation	**25 877,6**
Sodium Hydrosulfide	8,769.0
Potassium Butyl Xanthate	482.9
Sodium Isobutyl Xanthate	16.6
Foaming ОПСБ	272.6
Pine Oil	122.6
Lime (>80% Activated)	11,677.9
Sodium Sulfide (60% Activated)	4,470.4
Antifoam/Flocculant	0.1
Other Reagents (incl. solvents & coolant)	65.7
Other Cylinder Gases	**121.1**
Propane Gas	15.9
Oxygen Gas	95.2
Carbon Dioxide Gas	3.9
Nitrogen Gas	3.3
Nitrogen Liquid	0.6
Argon Gas	1.7
Freon Gas R134A	0.5
Fuel	**22,467.8**
Petrol Premium A-95	728.6
Petrol A-91	159.5
Diesel	21,580.0

Renewable materials (in metric tons), 2024

Material	Weight
Paper	6
Wood Materials	88.6
Wrapping Bags (for Molybdenum)	4

GRI 301-2

Recycled and input materials used, 2024

Description	Value
Total input materials used	22,426,059.9 tons
Recycled input materials used	145.0 tons
Percentage of total input that is recycled	0.0006466%

Water

GRI 303-3

Water withdrawal by intake point and water stress[50], 2024 (in metric megaliters)

Water Intake Point	Volume
Total	**50,487.0**
Makanadjur	4.0
Tsaghkar 1/Sakkar 1 + Tsaghkar 2/Sakkar 2 + Pukhrut	3,799.0
Voghji	23,056.0
Voghji-1	314.0
Voghji-2	877.0
Voghji-3, Dzagedzor[51]	4,502.0
Geghi+Geghi Reservoir	15,647.0
Girathagh	0.44
Achanan	7.0
Achanan Dzor: for nursery	13.0
"Artsakh" drainage tunnel	2,267.0

Total water withdrawal by source[52] , 2024 (in metric megaliters)

Source	Volume
Total	**50,650.0**
Surface water	50,487.0
Third-party water	163.0

Third-party water breakdown, 2024 (in metric megaliters)

Source	Volume
Total	**163.0**
Kajaran city municipal supply	93.0
Kapan (Veolia Djur) supply	69.0
Yerevan city supply	0.17
Bottled water	0.5

[50] When compiling the information, the Company used publicly available and reliable tools and methodologies for the assessment of water stress in the given area, the available data defined by the WP were used as the basis for the calculations.

[51] Annual exceed was recorded at the Voghji-3, Dzagedzor intake point (the maximum permissible limits is 3,555.0 thousand of cubic metres).

[52] No groundwater, seawater, or industrial water was used.

Water intake by division (in metric megaliters), 2024

Division	Water intake quantity
Total	**50,487.0**
Processing/mill plant	49,959.9
Open pit (including drilling site)	3.22
Ore Crushing and Transportation Division	101.0
Open pit (including other workshops)	273.0
Energy workshop	104.0
Mechanical workshop	7.2
Parking station for trucks and vehicles	7.2
Environmental Department	0.44
Auxiliary	31.48

GRI 303-4

Total water discharge by source[52] (in metric megaliters), 2024

Source	Volume
Total	**39,318.0**
Surface water	39,270.0
Third-party water	48.0

GHG emissions

GRI 305-1

Gross direct (Scope 1) GHG emissions (in metric t CO_2-eq), 2024

Source	Emissions
Total GHG Emissions	**82,369.7**
Stationary Fuel Combustion	10,307.0
Mobile Fuel Combustion	72,062.0
Direct Fugitive Emissions	0.42

GRI 305-2

Gross Location-Based Energy Indirect (Scope 2) GHG Emissions by Mine Site (in metric tons CO_2-eq) 2024

Mine Site	Emissions
Total	**229,554**
Open pit	1,493
Processing plant/mill plant	202,047
TSF	10,532
Kapan base	212
Administration	576
Auxiliary buildings	14,694

GRI 305-4

Production and Financial Data, 2024

Aspect	Value
Ore treated	22,333,137 tonnes/year
Production amount	184,412.96 tonnes concentrate/year
- Cu concentrate	167,033 tonnes
- Mo concentrate	16,210.6 tonnes
- FeMo concentrate	1,169.3 tonnes
Revenue	658.8million EURO
Regular employees (FTE)	4,654 persons

GRI 305-7

Other Standard Categories of Air Emissions, (in metric ton/y), 2024

Emission Type	Emissions
Total	**153.1**
Sulfuric acid vapour	0.06
Nitric acid vapour	0.07
Hydrochloric acid vapour	0.09
Hydrocarbons without VOC (CxHy)	2.58
Carbon monoxide (CO)	150.3

[52] No groundwater, seawater, or industrial water was used.

Waste

GRI 306-2

Waste Generation and Outputs, 2024

Baseline Materials/Input	Waste Generation Process/Activity	Name of Waste/Outputs
Car batteries, office calculating machinery batteries	Operation of vehicles and technical means, organization's own activities	Exhausted lead batteries and grunge
H_2SO_4 sulfuric acid	Storage and disposal of exhausted lead batteries and grunge	H_2SO_4 from exhausted lead batteries and grunge
Vehicles' engine oils	Lubrication of vehicles' engines, organization's own activities	Waste of used engine oils
Vehicles' diesel engine oils	Lubrication of diesel engines, camshaft bearing screw, organization's own activities	Used diesel oil
Industrial oils	Operation and repair of equipment and machine tools, organization's own activities	Used industrial oil
Hydraulic oils	Operation and repair of equipment, machines, vehicles, organization's own activities	Used hydraulic oils
Sacks of building materials, reagents, explosives	Operation of vehicles and technical resources, organization's own activities	Harmfully polluted filter fabrics and sacks
Copper wires for electric motor windings	Electro-mounting works, metal processing, organization's own activities	Unsorted copper scrap
Sand, absorbent	Oil storage, emptying of containers, maintenance of transportation means, organization's own activities	Oil-contaminated sand
Crushed ore sample, concentrate sample, chemical materials	Laboratory experiments, organization's own activities	Other laboratory waste and chemical residues
Quartz sand used as a mold for making metal parts	Casting production for the preparation of molds, organization's own activities	Casting production sand
Welding electrodes	Welding work, organization's own activities	Welding slag
Tires of trucks, cars, loaders	Operation of auto transport and technical means, organization's own activities	Exhausted pneumatic tires
Ferrous metal (cast iron, steel)	Metal processing lathe operations, making various spare tool parts, organization's own activities	Waste containing unsorted ferrous metals
Construction materials	Construction and repair work, organization's own activities	Construction mix waste from the demolition of buildings
Paper, polypropylene materials, glass, cotton cloth, food remnants, iron, wood	Cleaning of household areas, organization's own activities	Unsorted waste generated from household territories
Cloths	Used and changing uniforms, organization's own activities	Other waste of contaminated textile
Sawdust	Oil storage, emptying of containers, maintenance of transportation means, organization's own activities	Oil-soaked sawdust
Clothes, textiles	Cleaning of equipment, pollution of overall, organization's own activities	Oily cloths (greasy shreds)
Ore, ore pulp	Mine enrichment, organization's own activities	Sludge and tailings of Processing Plant
Metallic liners from ferrous alloys (steel)	Mine enrichment in the mill plant, organization's own activities	Uncontaminated cast steel scrap in the form of pieces
Balls for milling	Mine enrichment in the mill plant, organization's own activities	Uncontaminated steel scrap metal chips
Sand for water treatment station	Water treatment process for steam production	Boiler water treatment sludge
Asbestos sheet, asbestos slate roofs, asbestos pipes	Construction, renovation work, furnace repair work, pipeline repair work	Asbestos waste in pieces
Wood	Tailing pipeline repair work	Unsorted soaked and coated timber waste
Ferrous metals (steel)	Manufacturing metallic parts, repairing works	Uncontaminated steel shavings
Boards, plywood and other timber used in construction	Equipment and device unboxing, molding work	Waste of pure natural wood
Wood	Woodworking, operation of wood processing lathe, organization's own activities	Pure natural sawdust
Mineral and drinking water containers, beverages-juice containers, polyethylene bags	Drinking, eating, opening of packaged boxes of products, organization's own activities	Uncontaminated plastic container
Conveyor belts, rubber tubes, other rubber items	Changing the conveyor belts and boots, organization's own activities	Uncontaminated rubber items deprived of their consumption properties
Aluminum wires, spare parts of tools	Changing electrical wires, organization's own activities	Uncontaminated aluminum wire unfits for use
Papers and cardboards	Opening the packed product, unboxing processing, organization's own activities	Uncontaminated cardboard packaging waste
Papers and cardboards	Administrative work, organization's own activities	Paper and cardboard waste generated from office work
Ore	Ore extraction, molding work, organization's own activities	Overburden (waste rock)

Waste reuse and recycling practices, 2024

Waste type and process	Description
Lead accumulators	Recharged and reused until properties are exhausted, then sent for recycling
Ferrous metals and steel scrap	Melted in the Mechanical workshop to create new metal details
Used industrial oil	Reused in ore crushing workshop
Sawdust	Reused in landfilling and oil spillage prevention
PP big bags	Separated and reused for collecting construction waste, unusable ones recycled
High-quality oils	Reused for equipment lubrication or heating
Maintenance practices	Conducted on concrete areas with pallets and sorbents to prevent oil leakage
Tires	Vulcanized and reused to reduce waste
Air filters	Cleaned and reused to extend service life
Natural wood waste	Reused in winter for thermal capacity in construction
Casting production sand	Separated from metal residues and reused

Waste management by third parties, 2024

Waste Type	Management Process
Pyrolysis	Used engine oils, diesel oil, industrial oil, hydraulic oils, polluted filter fabrics, exhausted tires, oil-sacked sawdust, oily cloths, oil-contaminated sand, uncontaminated rubber items
Landfill	Casting production sand, construction mix waste, unsorted household waste
Paper and cardboard processing	Office paper waste, uncontaminated cardboard packaging waste
Metal processing	Welding sludge, unsorted ferrous metals, alloyed steel scrap
Ore, ore pulp	Mine enrichment, organization's own activities
Metallic liners from ferrous alloys (steel)	Mine enrichment in the mill plant, organization's own activities
Balls for milling	Mine enrichment in the mill plant, organization's own activities
Sand for water treatment station	Water treatment process for steam production
Asbestos sheet, asbestos slate roofs, asbestos pipes	Construction, renovation work, furnace repair work, pipeline repair work
Wood	Tailing pipeline repair work
Ferrous metals (steel)	Manufacturing metallic parts, repairing works
Boards, plywood and other timber used in construction	Equipment and device unboxing, moulding work
Wood	Woodworking, operation of wood processing lathe, organization's own activities
Mineral and drinking water containers, beverages-juice containers, polyethylene bags	Drinking, eating, opening of packaged boxes of products, organization's own activities
Conveyor belts, rubber tubes, other rubber items	Changing the conveyor belts and boots, organization's own activities
Aluminum wires, spare parts of tools	Changing electrical wires, organization's own activities
Papers and cardboards	Opening the packed product, unboxing processing, organization's own activities
Papers and cardboards	Administrative work, organization's own activities
Ore	Ore extraction, moulding work, organization's own activities

GRI 306-3, SASB EM-MM-150a.5, EM-MM-150a.6.

Breakdown of Waste Types (in metric tons), 2024

Waste Description	Weight
Total	36,943,886
Exhausted Lead Batteries and Grunge	10.7
H_2SO_4 from Exhausted Lead Batteries	0.86
Waste of Used Engine Oils	9.2
Used Diesel Oil	117.3
Used Industrial Oil	39.8
Used Hydraulic Oils	63.6
Harmfully Polluted Filter Fabrics	190.6
Unsorted Copper Scrap	1.7
Oil-Contaminated Sand	98.3
Other Laboratory Waste	1.2
Casting Production Sand	70
Welding Slag	0.4
Exhausted Pneumatic Tires	657.4
Waste Containing Unsorted Ferrous Metals	1,587.1
Construction Mix Waste	30,007.0
Unsorted Household Waste	267.6
Other Waste of Contaminated Textile	0
Oil-Sacked Sawdust	0
Oily Cloths	1.2
Sludge and Tailings of Processing Plant	19,150,851.0[53]
Boiler Water Treatment Sludge	0.0
Asbestos Waste	0.0
Unsorted Soaked Timber Waste	0.0
Uncontaminated Steel Shavings	51.8
Uncontaminated Alloyed Steel Scrap	2,057.8
Uncontaminated Steel Scrap Metal Chips	0.0
Waste of Pure Natural Wood	33.8
Pure Natural Sawdust	3.7
Uncontaminated Plastic Container	3.1
Uncontaminated Rubber Items	114.1
Uncontaminated Aluminum Wire	0.5
Uncontaminated Cardboard Packaging Waste	1.4
Paper and Cardboard Waste	4.2
Overburden (Waste Rock)	17,757,641.0[54]

[53] The definition of tailings is consistent with that provided in the Global Tailings Review Global Industry Standard on Tailings Management (GISTM).

[54] Waste rock is defined as mineral materials and low-grade ore with no economic interest at the time of mining.

GRI 306-4

Total Waste Diverted from Disposal (in metric tons), 2024

Waste Type	Weight
Total Waste Diverted	**2,086.1**
Waste of Used Engine Oils	9.0
Used Diesel Oil	134.6
Used Industrial Oil	51.3
Used Hydraulic Oils	67.8
Harmfully Polluted Filter Fabrics	189.8
Oil-Contaminated Sand	94.6
Exhausted Pneumatic Tires	1,319.3
Waste Containing Unsorted Ferrous Metals	19.8
Oily Cloths	1.2
Uncontaminated Alloyed Steel Scrap	21.9
Uncontaminated Steel Shavings	51.8
Waste of Pure Natural Wood	28.8
Uncontaminated Rubber Items	85.9
Uncontaminated Cardboard Packaging Waste	4.0
Paper and Cardboard Waste	6.4

SASB EM-MM-110a.1.

CO_2, CH_4, and N_2O emissions resulted from natural gas, petrol, and diesel consumption (in metric tons), 2024

	Natural Gas	Petrol	Diesel	Total
CO_2	10,286.7	2,801.7	68,286.2	81,374.6
CH_4	14.0	8.8	6.7	29.5
N_2O	5.5	8.1	952.1	965.7

[55] In 2023, mixed waste from construction activities, building, and equipment demolition (classified as 5th-class) was introduced to replace the previously recorded construction waste from building demolition (classified as 4th-class hazardous). This change suggests that unsuitable equipment has also been included in this waste stream. Construction waste from building demolition classified as 4th-class has not been recorded in the waste registry book since 2024.

The sharp increase in construction waste generation is linked to the large-scale construction projects undertaken by the Company in 2024.

GRI 306-3, SASB EM-MM-150a.4, SASB EM-MM-150a.7

Non-mineral hazardous waste generated (in metric tons)

Waste type	2023	2024	Class of hazard
Total waste	3,598.23	**3,116.5**	2-nd, 3-rd, 4-th
Exhausted lead batteries and grunge	9.84	**10.1**	2-nd
H_2SO_4 from exhausted lead batteries and grunge	n/a	**0.86**	2-nd
Waste of used engine oils	7.75	**9.165.0**	3-rd
Used diesel oil	116.52	**117.3**	3-rd
Used industrial oil	48.59	**39.846.0**	3-rd
Used hydraulic oils	52.16	**63.6**	3-rd
Harmfully (inorganically) polluted filter fabrics and sacks	140.93	**190.558.0**	3-rd
Unsorted copper scrap	1.37	**1.7**	3-rd
Oil-contaminated sand (oil content is less than 15%)	0.1	**98.3**	4-th
Other laboratory waste and chemical residues	3.97	**1.2**	4-th
Casting production sand	70	**70.0**	4-th
Welding slag	0.1	**0.37**	4-th
Exhausted pneumatic tires	485.08	**657.4**	4-th
Waste containing unsorted ferrous metals (including cast iron and/or steel powder)	1,331.45	**1587.2**	4-th
Construction waste generated from the demolition of buildings[55]	1,091.00	**n/a**	4-th
Unsorted waste generated from household territories of the Company (except for the huge edge-cuttings)	239.1	**267.6**	4-th
Oil-sacks sawdust	0.27	**0**	4-th
Oily clothes (greasy shreds)	0	**1.2**	4-th

GRI 306-3

Non-mineral non-hazardous waste generated (in metric tons)

Waste type	2023	2024
Total waste	2,047.0	**32,277.0**
Uncontaminated casted steel scrap in pieces	1,758.8	**2,057.8**
Uncontaminated steel shavings	19.8	**51.8**
Waste of pure natural wood	178.0	**33.8**
Pure natural sawdust	0.96	**3.7**
Uncontaminated plastic container deprived of its consumption properties	0.99	**3.1**
Uncontaminated rubber items deprived of their consumption properties	78.6	**114.1**
Uncontaminated aluminum wire unfits for use	1.3	**0.51**
Uncontaminated cardboard packaging waste	3.3	**1.4**
Paper and cardboard waste generated from office work	5.2	**4.2**
Mixed waste from construction, building and equipment demolition	n/a	**30,007.0**[55]

Information for waste diverted from disposal (in metric tons)

Recovery operations	2023	2024	Percentage change
onsite	9.9	**29.5**	198.8%
offsite	1,723.7	**1,857.8**	7.8%
Total hazardous waste recovered	**1,733.5**	**1,887.3**	**8.9%**
onsite	0.3	**0**	-
offsite	1,878.9	**198.8**	-89.4%
Total non-hazardous waste recovered	**1,879.2**	**198.8**	**-89.4%**

GRI 306-4

Waste directed to disposal (in metric tons)

Waste type	2023	2024	Percentage change
Total	**36,380,298.2**	**36,938,838.1**	**1.5%**
Hazardous waste:	**21,229,993.2**	**19,151,190.0**	**-9.8%**
Incineration (with energy recovery)	0	**0**	0.00%
Incineration (without energy recovery)	2.0	**1.5**	-24.2%
Landfilling	1,400.1	**337.6**	-75.9%
Other disposal operations	21,228,591.0	**19,150,851.0**	-9.8%
Non-hazardous waste:	**15,150,305.1**	**17,787,648.0**	**17.4%**
Incineration (with energy recovery)	0.00	**0.00**	0.00%
Incineration (without energy recovery)	0.00	**0.00**	0.00%
Landfilling	16.1	**30,007.0**	186,163.0%
Other disposal operations	15,150,289.0	**17,757,641.0**	17.2%

Composition of waste directed to disposal (in metric tons)

Waste type	2023	2024
Total waste directed	**36,380,282.1**	**36,938,838.1**
Other laboratory waste and chemical residues	1.98	**1.50**
Casting production sand	70.0	**70.0**
Construction waste generated from the demolition of buildings	1,091.0	**30,007.0**
Unsorted waste generated from household territories of the Company	239.1	**267.6**
Sludge and tailings of Processing Plant	21,228,591.0	**19,150,851.0**
Overburden	15,150,289.0	**17,757,641.0**

SASB EM-MM-150a.8

Composition of hazardous waste recycled (in metric tons)

Waste type	2023	2024
Total waste	**1,596.3**	**1,857.8**
Exhausted lead batteries and grunge	13.7	**0.0**
Waste of used engine oils	6.3	**9.0**
Used diesel oil	108.7	**134.6**
Used hydraulic oils not containing halogens	44.8	**67.8**
Used industrial oil	23.0	**41.6**
Harmfully (inorganically) polluted filter fabrics and sacks	139.6	**189.8**
Oil-contaminated sand (oil content is less than 15%)	0.1	**94.6**
Exhausted pneumatic tires	744.6	**1319.3**
Waste containing unsorted ferrous metals (including cast iron and/or steel powder)	515.4	**0.0**
Oily clothes (greasy shreds)	0.3	**1.2**

GRI 306-4

Composition of hazardous waste reused (in metric tons)

Waste type	2023	2024
Total	**137.3**	**29.5**
Used industrial oil	8.0	**9.7**
Used diesel oil	0.19	**n/a**
Waste containing unsorted ferrous metals (including cast iron and / or steel powder)	n/a	**19.8**
Exhausted pneumatic tires	127.4	**n/a**
Other laboratory waste and chemical residues	1.7	**n/a**

GRI 306-4

Composition of non-hazardous waste reused (in metric tons)

Waste type	2023	2024
Total	**279.0**	**166.5**
Uncontaminated steel shavings	19.8	**51.8**
Waste of pure natural wood	166.3	**28.8**
Uncontaminated rubber items deprived of their consumption properties	86.6	**85.9**
Waste containing steel in the form of pieces	5.2	**n/a**
Uncontaminated plastic container deprived of its consumption properties	1.0	**n/a**

SASB EM-MM-140a.2

Fees for discharges of harmful substances and compounds to the water resource, 2024 (in USD[56])

Quarter	Total environmental fees, including penalties	Metric tons	Administrative penalties/ fines for violations[57]	Metric tons
Annual total	**142,425.2**	**42,705.0**	**78,131.5**	**5,695.2**
First quarter	28,739.9	18,076.0	6,258.9	3,649.0
Second quarter	33,059.8	11,822.0	15,583.7	824.4
Third quarter	48,758.2	6,635.0	39,303.3	782.6
Fourth quarter	31,867.3	6,172.0	16,985.6	439.1

Fees for discharges of harmful substances and compounds to the water resource, 2023 (in USD)

Quarter	Total environmental fees, including penalties	Metric tons	Administrative penalties/ fines for violations	Metric tons
Annual total	**64,592.9**	**48,726.0**	**17,323.0**	**8,464.7**
First quarter	6,582.2	10,152.0	3,903.2	3,924.2
Second quarter	11,006.8	12,154.0	3,701.7	3,264.0
Third quarter	16,665.8	12,274.0	3,130.6	423.6
Fourth quarter	30,338.0	14,146.0	6,587.6	852.9

Human Capital[58]

Composition of permanent and temporary employees by gender

Indicator	2023 Total	2023 Permanent employees	2023 Temporary employes	2024 Total	2024 Permanent employees	2024 Temporary employes
Number of employees as of 31 December of the reporting year	4,666	4,638	28	**4,654**	**4,623**	**31**
Men	3,640	3,621	19	**3,617**	**3,595**	**22**
Women	1,026	1,017	9	**1,037**	**1,028**	**9**

Composition of permanent and temporary employees by location

Indicator	2023 Total	2023 Permanent employees	2023 Temporary employes	2024 Total	2024 Permanent employees	2024 Temporary employes
Number of employees as of 31 December of the reporting year	4,666	4,638	28	**4,654**	**4,623**	**31**
Kapan and Kajaran	4,134	4,115	19	**4,130**	**4,103**	**27**
Other regions of Armenia and abroad	532	523	9	**524**	**520**	**4**

[56] USD 1 = AMD 392.84

[57] The administrative penalty orders relate to the continuous wastewater discharges from Artsvanik TSF to the Achanan River.

[58] Data is reported based on actual head counts taken at the end of the reporting period on 31/12/2024.

Composition of full-time and part-time employees by gender

Indicator	2023 Total	2023 Full-time employees	2023 Part-time employees	2024 Total	2024 Full-time employees	2024 Part-time employees
Number of employees as of 31 December of the reporting year	4,666	4,662	4	**4,654**	**4,651**	**3**
Men	3,640	3,639	1	**3,617**	**3,617**	**-**
Women	1,026	1,023	3	**1,037**	**1,034**	**3**

Composition of full-time and part-time employees by location

Indicator	2023 Total	2023 Full-time employees	2023 Part-time employees	2024 Total	2024 Full-time employees	2024 Part-time employees
Number of employees as of 31 December of the reporting year	4,666	4,662	4	**4,654**	**4,651**	**3**
Kapan and Kajaran	4,134	4,130	4	**4,130**	**4,129**	**1**
Other regions of Armenia	532	532	-	**524**	**522**	**2**

Employee turnover, people (by gender, age group, and region)

Indicator	2023	2024
By gender		
Men	193	190
Women	63	38
By age group		
Under 30 years old	16	20
30-50 years old	55	71
Over 50 years old	185	137
By region		
Local (Kajaran and Kapan communities)	192	176
From other regions of the RA and abroad	64	52
Total turnover	256	228

Other Topics

GRI 2-27

Administrative penalties in USD, 2024

Date	Counteragent	Amount	Description
4/30/2024	State budget	1,273	Administrative penalty according to N 701115/20 decision as of 01.02.2024 (penalty for not presenting a financial report)
9/3/2024	State budget	127	Administrative penalty according to N ՎԲ0046042 decision as of 29.08.2024 (penalty for not publishing a financial report)
5/2/2024	State budget	51	Administrative penalty according to N 01, decision as of 22.04.2024 (administrative penalty for violation of legislation in the field of atomic energy use)
8/26/2024	State budget	51	Administrative penalty according to N ՎԲ0040396 decision, as of 19.08.2024 (penalty for failure to file an import tax return)
5/21/2024	State budget	25	Administrative penalty according to N ՎԲ0008270 decision, as of 18.04.2024 (penalty for failure to file an import tax return)

Appendix 4

Abbreviations

Abbreviation	Full Form
ABBC	Armenian British Business Chamber
APCS	Automated Process Control System
BoD	Board of Directors
CAPEX	Capital Expenditure
CDM	The Clean Development Mechanism
CEO	Chief Executive Officer
CJSC	Closed Joint Stock Company
CO	Carbon Monoxide
CO2	Carbon Dioxide
Cu	Copper
CxHy	Hydrocarbons without VOC
EBRD	European Bank for Reconstruction and Development
EITI	Extractive Industries Transparency Initiative
ERP	Enterprise Resource Planning
ESG	Environmental, Social, and Governance
EV	Electric Vehicle
FeMo	Ferromolybdenum
GDP	Gross Domestic Product
GHG	Greenhouse Gas
GISTM	Global Industry Standard on Tailings Management
GJ	Gigajoules
GRI	Global Reporting Initiative
H&S	Health and Safety
HFCs	Hydrofluorocarbons
ICAM	Incident Cause Analysis Method
ICMM	International Council on Mining and Metals
IFC	International Finance Corporation
IFRS	International Financial Reporting Standards
ILO	International Labour Organization

Abbreviation	Full Form
IPCC	The Intergovernmental Panel on Climate Change
ISO	International Organization for Standardization
ISO 14001	ISO's standard for Environmental Management Systems
ISO 14001-2015	The specific version of the ISO standard for Environmental Management Systems
ISO 20400:2017	The specific version of the ISO standard for Sustainable Procurement
ISO 45001	ISO's standard for Occupational Health and Safety Management System
IUCN	International Union for Conservation of Nature
kg	Kilogram
KPIs	Key Performance Indicators
LIMS	Laboratory Information Management System
LLC	Limited Liability Company
LTI	Lost Time Injury
LTIFR	Lost Time Injury Frequency Rate
m^3	Cubic Meter
MES	Manufacturing Execution System
Mo	Molybdenum
MOU	Memorandum of Understanding
NDC	Nationally Determined Contributions
NF3	Nitrogen Trifluoride
NGO	Non-Governmental Organization
NOx	Nitrogen Oxides
OHS	Occupational Health and Safety
OHSAS	Occupational Health and Safety Assessment Series
OH Services	Occupational Health Services
OPEX	Operational Expenditure
PDCA	Plan-Do-Check-Act
PFCs	Perfluorinated Compounds
PPE	Personal Protective Equipment
PPE	Property, Plant, and Equipment

Abbreviations

Abbreviation	Full Form
RA	Republic of Armenia
SASB	Sustainability Accounting Standards Board
SASB EM-MM	SASB Code for Mining and Metals, specific to Environmental Management
SEP	Stakeholder Engagement Plan
SF6	Sulfur Hexafluoride
SOx	Sulfur Oxides
tCO2-eq	Carbon Dioxide equivalent in metric ton
TCFD	Task Force on Climate-related Financial Disclosures
TDS	Total Dissolved Solids
TNFD	Taskforce on Nature-related Financial Disclosures
TSF	Tailings Storage Facility
UMBA	Union of Manufacturers and Businessmen of Armenia
UMMA	Union of Miners and Metallurgists of Armenia
UN	United Nations
USD	United States Dollar
VOCs	Volatile Organic Compounds
wmt	Wet Metric Tons
ZCMC	Zangezur Copper Molybdenum Combine

Appendix 5

GRI Content Index

Statement of use	ZCMC has reported in accordance with the GRI Standards for the period from January 1, 2024, to December 31, 2024
GRI 1 used	GRI 1: Foundation 2021
Applicable GRI Sector Standard(s)	Not applicable

GRI standard	Disclosure	Location	Notes
General Disclosures			
GRI 2 General Disclosures 2021	**1. The organization and its reporting practices**		
	2-1 Organizational details	Who We Are: "Zangezur Copper Molybdenum Combine" CJSC	
	2-2 Entities included in the organization's sustainability reporting	Steering the Vision: Our Senior Management Team	
	2-3 Reporting period, frequency and contact point	About this Report Appendix 1	
	2-4 Restatements of information	About this Report Appendix 1	
	2-5 External assurance	About this Report Appendix 1	
	2. Activities and workers		
	2-6 Activities, value chain and other business relationships	Business Model and Value Chain	
	2-7 Employees	Human Capital Dynamics: Promoting Workforce Stability and Local Engagement	There are no employees at ZCMC on non-guaranteed hours contracts.
	2-8 Workers who are not employees	Engaging External Expertise: Partnering with Non-Staff Professionals	
	3. Governance		
	2-9 Governance structure and composition	Corporate Governance Structure: Ensuring Effective Management and Oversight General Meeting of Shareholders Board of Directors	The tenure for members of the Board of Directors has not been yet established. We do not disclose information on number of other significant positions and commitments held by each member, and the nature of the commitments due to confidentiality reasons. We do not currently have independent directors in the Board. As per local legislation we are not required to have independent directors.

GRI standard	Disclosure	Location	Notes
GRI 2 General Disclosures 2021	2-10 Nomination and selection of the highest governance body	Corporate Governance Structure: Ensuring Effective Management and Oversight Board of Directors	
	2-11 Chair of the highest governance body	Chairman of the Board of Directors	The highest governance body of ZCMC is the General Meeting of Shareholders pursuant to ZCMC's Charter. Chairman of the Board of Directors is not a senior executive of the Company.
	2-12 Role of the highest governance body in overseeing the management of impacts	Role of the Highest Governance Body in Overseeing Impact Management Accountability in Impact Management: Advancing Strategic Leadership in Sustainability	
	2-13 Delegation of responsibility for managing impacts	Accountability in Impact Management: Advancing Strategic Leadership in Sustainability	
	2-14 Role of the highest governance body in sustainability reporting	Accountability in Impact Management: Advancing Strategic Leadership in Sustainability	Sustainability Report is reviewed by the senior management, including the respective Department involved in the composition of the Report. The Board of Directors is not currently involved in sustainability reporting.
	2-15 Conflicts of interest	Integrity in Decision-Making: Strengthening Governance Through Conflict-of-Interest Management	The regulations guiding the conflict of interest are included in the Code of Conduct, approved in 2024.
	2-16 Communication of critical concerns	Corporate Governance Structure: Ensuring Effective Management and Oversight Communication of Critical Concerns	Though the Policies and internal regulations outlining the identified violations and the necessary corrective actions were approved by the Board at the end of the reporting period, no reportable violations are recorded for 2024.
	2-17 Collective knowledge of the highest governance body	Role of the Highest Governance Body in Overseeing Impact Management	As of the reporting period, there are no formal mechanisms to develop the collective knowledge, skills, and experience of the highest governance body. Nonetheless, members of the General Meeting of Shareholders and the Board of Directors may seek professional advice on relevant issues as required.
	2-18 Evaluation of the performance of the highest governance body	Performance Evaluation	There is no formal process of evaluation of the performance of the highest governance body.
	2-19 Remuneration policies	Compensation Strategy: Aligning Pay with Strategic Objectives and Performance Outcomes	
	2-20 Process to determine remuneration	Compensation Strategy: Aligning Pay with Strategic Objectives and Performance Outcomes	
	2-21 Annual total compensation ratio	-	The information on the highest paid individual remuneration is confidential according to the Company's policies. Information on total «Management remuneration» is reported annually in the financial statements.

GRI standard	Disclosure	Location	Notes
GRI 2 General Disclosures 2021	**4. Strategy, policies and practices**		
	2-22 Statement on sustainable development strategy	Statement from the General Director Statements from the Sustainable Development Director	
	2-23 Policy commitments	Corporate Governance: Upholding Integrity in Leadership	It's included in the Code of Conduct and other related policies.
	2-24 Embedding policy commitments	Corporate Governance: Upholding Integrity in Leadership	We have developed a Human Right Policy which is expected to be approved by the end of the year.
	2-25 Processes to remediate negative impacts	Grievance Mechanism	Grievance Mechanism
	2-26 Mechanisms for seeking advice and raising concerns	Grievance Mechanism	Whistleblowing
	2-27 Compliance with laws and regulations	Compliance with Laws and Regulations: Ensuring Legal Adherence and Ethical Governance	
	2-28 Membership associations	Engagement: Demonstrating a Strong Commitment to the Industry	
	5. Stakeholder engagement		
	2-29 Approach to stakeholder engagement	Stakeholder Engagement	
	2-30 Collective bargaining agreements	Employee Rights: Ensuring Non-Discrimination and Supporting Collective Bargaining	
Material topics			
GRI 3 Material topics 2021	3-1 Process to determine material topics	Appendix 2	
	3-2 List of material topics	Appendix 2	
Economic impact			
GRI 3 Material topics 2021	3-3 Management of material topics	Economic Impact: Contributing to Local and National Development	
GRI 201 Economic performance 2016	201-1 Direct economic value generated and distributed	Economic Impact: Contributing to Local and National Development Economic Impact in Numbers	
GRI 201: Economic Performance 2016	201-1 Direct economic value generated and distributed	Commitment to Fair Compensation	No defined benefit plan obligations or other retirement plans are established within the Company.

GRI standard	Disclosure	Location	Notes
GRI 201 Economic performance 2016	201-4 Financial assistance received from government	–	During the reporting periods, ZCMC did not receive any financial assistance from the RA Government.
GRI 3 Material topics 2021	3-3 Management of material topics	Engagement with Tax Authorities and Stakeholders	
GRI 202 Market Presence 2016	202-1 Ratios of standard entry level wage by gender compared to local minimum wage	Commitment to Fair Compensation	Ratios of standard entry level wage by gender compared to local minimum wage is not disclosed in this Report. We will continue to work on disclosing this metric in the future.
Community engagement			
GRI 3 Material topics 2021	3-3 Management of material topics	Compensation and Benefits: Enhancing Employee Well-being	
GRI 203 Indirect Economic Impacts 2016	203-1 Infrastructure investments and services supported	Local Communities: Building Engagement and Shared Value Community Investments	
GRI 203 Indirect Economic Impacts 2016	203-2 Significant indirect economic impacts	Indirect Economic Impact	
GRI 413 Local communities 2016	413-1 Operations with local community engagement, impact assessments, and development programs	Community Needs and Impact Assessments	All operations of ZCMC are in one place, so the implemented local community engagement, impact assessments, and/or development programs cover 100% operations.
Business Ethics, Anti-corruption and Transparency			
GRI 3 Material topics 2021	3-3 Management of material topics	Anti-Corruption Commitment: Upholding Ethical Standards and Compliance	
GRI 205 Anti-corruption 2016	205-1 Operations assessed for risks related to corruption	Anti-Corruption Commitment: Upholding Ethical Standards and Compliance	Total number and percentage of operations for risks related to corruption were not assessed for the current reporting year. Significant risks related to corruption have not been identified for the current reporting year.
	205-2 Communication and training about anti-corruption policies and procedures	Anti-Corruption Commitment: Upholding Ethical Standards and Compliance	The company approved an Anti-Corruption Policy during the reporting year.
	205-3 Confirmed incidents of corruption and actions taken	Compliance with Laws and Regulations: Ensuring Legal Adherence and Ethical Governance	
GRI 206 Anti-competitive Behaviour 2016	206-1 Legal actions for anti-competitive behavior, anti-trust, and monopoly practices	Compliance with Laws and Regulations: Ensuring Legal Adherence and Ethical Governance	
Payments to governments			
GRI 3 Material topics 2021	3-3 Management of material topics	Public Policy: Engagement with Tax Authorities and Stakeholders	
GRI 207 Tax 2019	207-1 Approach to tax	Tax Governance: Transparency and Executive Accountability	
	207-2 Tax governance, control, and risk management	Tax Governance: Transparency and Executive Accountability	
	207-3 Stakeholder engagement and management of concerns related to tax	Public Policy: Engagement with Tax Authorities and Stakeholders	
	207-4 Country-by-country reporting	Economic Impact: Contributing to Local and National Development Economic Impact in Numbers	
Supply chain responsibility			
GRI 3 Material topics 2021	3-3 Management of material topics	Supply Chain Responsibility	
GRI 301 Materials 2016	301-1 Materials used by weight or volume	Supply Chain Responsibility	
GRI 204 Procurement practices 2016	204-1 Proportion of spending on local suppliers	Procurement and Economic Development	
GHG emissions			
GRI 3 Material topics 2021	3-3 Management of material topics	Energy Management Strategy: Monitoring, Optimizing, and Reducing Energy Consumption	
GRI 302 Energy 2016	302-1 Energy consumption within the organization	Energy Management Strategy: Monitoring, Optimizing, and Reducing Energy Consumption	
	302-2 Energy consumption outside of the organization	-	The Company does not consume energy outside the scope of its activities.
	302-3 Energy intensity	Energy Management Strategy: Monitoring, Optimizing, and Reducing Energy Consumption	
	302-4 Reduction of energy consumption	Energy Management Strategy: Monitoring, Optimizing, and Reducing Energy Consumption	Data collection on the energy reduction achieved through conservation and efficiency initiatives is in progress. The Company is actively preparing to gather and report this information in the near future.
Water and effluents			
GRI 3 Material topics 2021	3-3 Management of material topics	Water Management Strategy: Managing Scarcity Through Responsible Stewardship and Compliance	
GRI 303 Water and Effluents 2018	303-1 Interactions with water as a shared resource	Water Management Strategy: Managing Scarcity Through Responsible Stewardship and Compliance	

GRI standard	Disclosure	Location	Notes
GRI 303 Water and Effluents 2018	303-2 Management of water discharge-related impacts	Water Management Strategy: Managing Scarcity Through Responsible Stewardship and Compliance	
	303-3 Water withdrawal	Water Management Strategy: Managing Scarcity Through Responsible Stewardship and Compliance	
	303-4 Water discharge	Water Management Strategy: Managing Scarcity Through Responsible Stewardship and Compliance	
	303-5 Water consumption	Water Management Strategy: Managing Scarcity Through Responsible Stewardship and Compliance	
Biodiversity			
GRI 3 Material topics 2021	3-3 Management of material topics	Biodiversity Management and Ecosystem Restoration: Aligning Operations with Ecological Standards and International Frameworks	
GRI 304 Biodiversity 2016	304-1 Operational sites owned, leased, managed in, or adjacent to, protected areas and areas of high biodiversity value outside protected areas	Biodiversity Management and Ecosystem Restoration: Aligning Operations with Ecological Standards and International Frameworks	Production activities of the Company do not affect protected environmental areas.
	304-2 Significant impacts of activities, products, and services on biodiversity	Biodiversity Management and Ecosystem Restoration: Aligning Operations with Ecological Standards and International Frameworks	GRI 304-32 is partial due to the current lack of data on population trends and species-specific impacts, limiting the ability to quantitatively assess biodiversity losses, benefits, or reversibility, with more detailed biodiversity research initiated in 2024 to align practices with the EBRD biodiversity standard, with results expected in future reports
	304-3 Habitats protected or restored	Biodiversity Management and Ecosystem Restoration: Aligning Operations with Ecological Standards and International Frameworks	GRI 304-3 is partial due to the fact that the results of the 21.6 hectares land restoration, including the reclamation of the Artsvanik tailings embankment and Dzoratag dam, have not yet undergone external verification, and no third-party partnerships were established for habitat protection or restoration beyond the company's direct efforts, with external verification still in planning.
	304-4 IUCN Red List species and national conservation list species with habitats in areas affected by operations	Biodiversity Management and Ecosystem Restoration: Aligning Operations with Ecological Standards and International Frameworks Environmental Restoration and Closure Planning: Integrating Restoration with Active Operations and Long-Term Environmental Goals	The GRI 304-4 is partial due to the incomplete determination of the exact number of species on the IUCN Red List and national conservation lists in areas affected by the company's operations, with a full quantitative assessment still in progress

GRI standard	Disclosure	Location	Notes
GHG emissions			
GRI 3 Material topics 2021	3-3 Management of material topics	GHG Emissions: Targeting the Improvement in Production Efficiency	
GRI 305 Emissions 2016	305-1 Direct (Scope 1) GHG emissions	GHG Emissions: Targeting the Improvement in Production Efficiency	
	305-2 Energy indirect (Scope 2) GHG emissions	GHG Emissions: Targeting the Improvement in Production Efficiency	
	305-3 Other indirect (Scope 3) GHG emissions	GHG Emissions: Targeting the Improvement in Production Efficiency	
	305-4 GHG emissions intensity	GHG Emissions: Targeting the Improvement in Production Efficiency	
Air emissions			
GRI 3 Material topics 2021	3-3 Management of material topics	Air Emissions Control: Emission Reduction Initiatives: Enhancing Workplace Safety	
GRI 305 Emissions 2016	305-7 Nitrogen oxides (NOx), sulfur oxides (SOx), and other significant air emissions	Air Emissions Control: Emission Reduction Initiatives: Enhancing Workplace Safety	
Waste			
GRI 3 Material topics 2021	3-3 Management of material topics	Waste Management: Monitoring, Reduction, and Regulatory Alignment	
GRI 306 Waste 2020	306-1 Waste generation and significant waste-related impacts	Waste Management: Monitoring, Reduction, and Regulatory Alignment	
	306-2 Management of significant waste-related impacts	Waste Management: Monitoring, Reduction, and Regulatory Alignment	
	306-3 Waste generated	Waste Management: Monitoring, Reduction, and Regulatory Alignment	
	306-4 Waste diverted from disposal	Waste Management: Monitoring, Reduction, and Regulatory Alignment	
	306-5 Waste directed to disposal	Waste Management: Monitoring, Reduction, and Regulatory Alignment	
Employee management			
GRI 3 Material topics 2021	3-3 Management of material topics	Human Capital: Compensation and Benefits: Enhancing Employee Well-being	

GRI standard	Disclosure	Location	Notes
GRI 401 Employment 2016	401-1 New employee hires and employee turnover	Human Capital Dynamics: Promoting Workforce Stability and Local Engagement	
	401-2 Benefits provided to full-time employees that are not provided to temporary or parttime employees	Compensation and Benefits: Enhancing Employee Well-being	
	401-3 Parental leave	Compensation and Benefits: Enhancing Employee Well-being	
GRI 402 Labor/ Management Relations 2016	402-1 Minimum notice periods regarding operational changes	Navigating Change: Effective communication and digital transformation	The minimum notice period typically provided is 3 days, in accordance with the RA Labor Code.
Employee safety			
GRI 3 Material topics 2021	3-3 Management of material topics	Advancing Organizational Wellbeing and Resilience Through Adopting a Strong Occupational Health and Safety Culture	
GRI 403 Occupational Health and Safety 2018	403-1 Occupational health and safety management system	Advancing Organizational Wellbeing and Resilience Through Adopting a Strong Occupational Health and Safety Culture	
	403-2 Hazard identification, risk assessment, and incident investigation	Comprehensive Risk Assessment and Safety Management: Enhancing Proactive Protection and Workplace Safety	
	403-3 Occupational health services	Strengthening Workplace Safety: Ensuring Access to Quality Occupational Health Services for Hazard Prevention and Risk Reduction	
	403-4 Worker participation, consultation, and communication on occupational health and safety	Worker Engagement and the Right to a Safe Workplace	
	403-5 Worker training on occupational health and safety	Comprehensive Health and Safety Training: Building a Safer Workplace Through Targeted Education and Awareness	
	403-6 Promotion of worker health	Comprehensive Health and Safety Support: Ensuring Well-being Through Access to Medical Services	
	403-7 Prevention and mitigation of occupational health and safety impacts directly linked by business relationships	Advancing Organizational Wellbeing and Resilience Through Adopting a Strong Occupational Health and Safety Culture	
GRI 403 Occupational Health and Safety 2018	403-8 Workers covered by an occupational health and safety management system	Advancing Organizational Wellbeing and Resilience Through Adopting a Strong Occupational Health and Safety Culture	
	403-9 Work-related injuries	Comprehensive Risk Assessment and Safety Management: Enhancing Proactive Protection and Workplace Safety	
	403-10 Work-related ill health	Comprehensive Risk Assessment and Safety Management: Enhancing Proactive Protection and Workplace Safety	
Employee management			
GRI 3 Material topics 2021	3-3 Management of material topics	ZCMC's People: Drivers of Sustainable Success	
GRI 404 Training and Education 2016	404-1 Average hours of training per year per employee	Skill enhancement: Committing to workforce growth	
	404-2 Programs for upgrading employee skills and transition assistance programs	Skill enhancement: Committing to workforce growth	ZCMC currently does not provide transition or dismissal assistance programs aimed at supporting employees through career endings due to retirement or termination. The Company focuses on skill enhancement and professional development during the tenure of employment and does not have formal processes to facilitate post-employment employability or manage career transitions.
	404-3 Percentage of employees receiving regular performance and career development reviews	Performance and career development reviews	
Non-discrimination and equal opportunity			
GRI 3 Material topics 2021	3-3 Management of material topics	Compensation and Benefits: Enhancing Employee Well-being	
GRI 405 Diversity and Equal opportunity 2016	405-1 Diversity of governance bodies and employees	Steering the Vision: Our Senior Management Team	
GRI 406 Non-discrimination 2016	406-1 Incidents of discrimination and corrective actions taken	Workplace Conduct: Non-Discrimination and Violence Prevention	
Employee management			
GRI 3 Material topics 2021	3-3 Management of material topics	Employee Rights: Ensuring Non-Discrimination and Supporting Collective Bargaining Workplace Conduct: Freedom of Association and Collective Bargaining	

GRI standard	Disclosure	Location	Notes
GRI 405 Diversity and Equal opportunity 2016	405-2 Ratio of basic salary and remuneration of women to men	Commitment to Fair Compensation	
Community engagement			
GRI 3 Material topics 2021	3-3 Management of material topics	Local Communities: Building Engagement and Shared Value	
GRI 408 Child Labor 2016	408-1 Operations and suppliers at significant risk for incidents of child labor	-	Child labor is prohibited by Law. And no cases have been reported.
GRI 409 Forced or Compulsory Labor 2016	409-1 Operations and suppliers at significant risk for incidents of forced or compulsory labor	-	No operations within the Company are considered to have risks for incidents of forced or compulsory labor. No access to information regarding suppliers/ contractors in respect of incidents of forced or compulsory labor.
GRI 410: Security Practices 2016	410-1 Security personnel trained in human rights policies or procedures	Skill enhancement: Committing to workforce growth	The Human Rights policy was approved by the Board of Directors in December 2024. As part of the policy's implementation in 2025, security personnel will receive appropriate training on human rights policies and procedures.
GRI 413 Local communities 2016	413-1 Operations with local community engagement, impact assessments, and development programs	Community Needs and Impact Assessments	All operations of ZCMC are in one place, so the implemented local community engagement, impact assessments, and/or development programs cover 100% operations.
	413-2 Operations with significant actual and potential negative impacts on local communities	Community Needs and Impact Assessments	
Supply chain responsibility			
GRI 3 Material topics 2021	3-3 Management of material topics	Supply Chain Responsibility	
GRI 414 Supplier Social Assessment 2016	414-1 New suppliers that were screened using social criteria	Community Needs and Impact Assessments	The percentage of new suppliers that have passed social security screening is not available.
Public policy			
GRI 3 Material topics 2021	3-3 Management of material topics	–	
GRI 415 Public Policy 2016	415-1 Political contributions	–	ZCMC did not make any political contributions, either in cash or in kind, during the 2024 reporting period. This includes direct contributions to political parties, candidates, political action committees (PACs), or advocacy organizations whose primary purpose is to influence public policy or legislation. ZCMC maintains a policy of political neutrality and complies fully with national regulations prohibiting or restricting political financing by corporate entities.

GRI standard	Disclosure	Location	Notes
Additional GRI disclosure(s)			
GRI 416 Customer Health and Safety 2016	416-2 Incidents of non-compliance concerning the health and safety impacts of products and services	–	There were no incidents of non-compliance with regulations and/or voluntary codes concerning the health and safety impacts of products and services within the reporting period.
Additional GRI disclosure(s)			
GRI 417 Marketing and Labelling 2016	417-3 Incidents of non-compliance concerning marketing communications	-	There were no incidents of non-compliance with regulations and/or voluntary codes concerning marketing communications within the reporting period
Critical incident management			
GRI 3 Material topics 2021	3-3 Management of material topics	Comprehensive Risk Assessment and Safety Management: Enhancing Proactive Protection and Workplace Safety: Accident and Incident Investigations	
Closure and rehabilitation			
GRI 3 Material topics 2021	3-3 Management of material topics	Environmental Restoration and Closure Planning: Integrating Restoration with Active Operations and Long-Term Environmental Goals	
Freedom of association and collective bargaining			
GRI 3 Material topics 2021	3-3 Management of material topics	Employee Rights: Ensuring Non-Discrimination and Supporting Collective Bargaining Workplace Conduct: Freedom of Association and Collective Bargaining	
Tailings Storage Facility			
GRI 3 Material topics 2021	3-3 Management of material topics	Tailings Infrastructure and Monitoring: Strengthening Safety Systems and Aligning with Global Standards	
Climate change adaptation and resilience			
GRI 3 Material topics 2021	3-3 Management of material topics	Climate Change Governance: Upholding Transparency and Accountability in Addressing Climate Challenge	
GRI 3 Material topics 2021	3-3 Management of material topics	Digital Transformation Initiative: Shifting to Digital Across Operations	

Appendix 6

SASB Content Index

Topic	Metric	Code	Location and Notes
Greenhouse Gas Emissions	Gross global Scope 1 emissions, percentage covered under emissions-limiting regulations	EM-MM-110a.1	GHG Emissions: Targeting the Improvement in Production Efficiency
	Discussion of long- and short-term strategy or plan to manage Scope 1 emissions, emissions reduction targets, and an analysis of performance against those targets	EM-MM-110a.2	Environmental Stewardship and Resilience: Commitment to Continuous Improvement Climate Change Governance: Upholding Transparency and Accountability in Addressing Climate Challenge
Air Quality	Air emissions of the following pollutants: (1) CO, (2) NOx (excluding N_2O), (3) SOx, (4) particulate matter (PM10), (5) mercury (Hg), (6) lead (Pb), and (7) volatile organic compounds (VOCs)	EM-MM-120a.1	Air Emissions Control: Emission Reduction Initiatives: Enhancing Workplace Safety Note: the disclosure is partial due to the absence of monitoring data for mercury and lead, as well as the need for clarification on the PM and NOx categories
Energy Management	(1) Total energy consumed, (2) percentage grid electricity and (3) percentage renewable	EM-MM-130a.1	Energy Management Strategy: Monitoring, Optimizing, and Reducing Energy Consumption
Water Management	(1) Total water withdrawn, (2) total water consumed; percentage of each in regions with High or Extremely High Baseline Water Stress	EM-MM-140a.1	Water Management Strategy: Managing Scarcity Through Responsible Stewardship and Compliance
	Number of incidents of non-compliance associated with water quality permits, standards and regulations	EM-MM-140a.2	Water Management Strategy: Managing Scarcity Through Responsible Stewardship and Compliance
Waste & Hazardous Materials Management	Total weight of non-mineral waste generated	EM-MM-150a.4	Appendix 3
	Total weight of tailings produced	EM-MM-150a.5	Appendix 3
	Total weight of waste rock generated	EM-MM-150a.6	Appendix 3
	Total weight of hazardous waste generated	EM-MM-150a.7	Waste Management: Monitoring, Reduction, and Regulatory Alignment
	Total weight of hazardous waste recycled	EM-MM-150a.8	Appendix 3
	Number of significant incidents associated with hazardous materials and waste management	EM-MM-150a.9	Waste Management: Monitoring, Reduction, and Regulatory Alignment
	Description of waste and hazardous materials management policies and procedures for active and inactive operations	EM-MM-150a.10	Waste Management: Monitoring, Reduction, and Regulatory Alignment
Biodiversity Impacts	Description of environmental management policies and practices for active sites	EM-MM-160a.1	Environmental Stewardship and Resilience: Commitment to Continuous Improvement
	Percentage of mine sites where acid rock drainage is: (1) predicted to occur, (2) actively mitigated, and (3) under treatment or remediation	EM-MM-160a.2	In ZCMC we do not have an acid generation.
	Percentage of (1) proved and (2) probable reserves in or near sites with protected conservation status or endangered species habitat	EM-MM-160a.3	Biodiversity Management and Ecosystem Restoration: Aligning Operations with Ecological Standards and International Frameworks Note: The reported information does not provide specific quantitative data on the percentage of proven and probable reserves located in such areas as required by the indicator.
Security, Human Rights & Rights of Indigenous Peoples	Percentage of (1) proved and (2) probable reserves in or near areas of conflict	EM-MM-210a.1	Not applicable for ZCMC.
	Percentage of (1) proved and (2) probable reserves in or near indigenous land	EM-MM-210a.2	Not applicable for ZCMC.
	Discussion of engagement processes and due diligence practices with respect to human rights, indigenous rights, and operation in areas of conflict	EM-MM-210a.3	The company approved its Human Rights Policy during the reporting year
Community Relations	Discussion of process to manage risks and opportunities associated with community rights and interests	EM-MM-210b.1	Local Communities: Building Engagement and Shared Value Community Needs and Impact Assessments
	(1) Number and (2) duration of non-technical delays	EM-MM-210b.2	Workplace Conduct: Freedom of Association and Collective Bargaining
Labor Practices	Percentage of active workforce employed under collective agreements	EM-MM-310a.1	Workplace Conduct: Freedom of Association and Collective Bargaining
	(1) Number and (2) duration of strikes and lockouts	EM-MM-310a.2	There were no work stoppages involving 1000 or more workers lasting one full shift or longer during the reporting period.
Workforce Health & Safety	1) All-incidence rate, (2) fatality rate, (3) near miss frequency rate (NMFR) and (4) average hours of health, safety, and emergency response training for (a) direct employees and (b) contract employees	EM-MM-320a.1	Comprehensive Risk Assessment and Safety Management: Enhancing Proactive Protection and Workplace Safety Comprehensive Health and Safety Training: Building a Safer Workplace Through Targeted Education and Awareness Comprehensive Health and Safety Support: Ensuring Well-being through Access to Medical Services

Topic	Metric	Code	Location and Notes
Business Ethics & Transparency	Description of the management system for prevention of corruption and bribery throughout the value chain	EM-MM-510a.1	Anti-Corruption Commitment: Upholding Ethical Standards and Compliance
	Production in countries that have the 20 lowest rankings in Transparency International's Corruption Perception Index	EM-MM-510a.2	Not applicable, as the only country where ZCMC operates is Armenia.
Tailings Storage Facilities Management	Tailings storage facility inventory table: (1) facility name, (2) location, (3) ownership status, (4) operational status, (5) construction method, (6) maximum permitted storage capacity, (7) current amount of tailings stored, (8) consequence classification, (9) date of most recent independent technical review, (10) material findings, (11) mitigation measures, (12) site-specific EPRP	EM-MM-540a.1	Tailings Infrastructure and Monitoring: Strengthening Safety Systems and Aligning with Global Standards Note: The disclosure is partially provided due to the absence of consequence classification, site-specific EPRP confirmation, tabular presentation of mitigation measures, and ownership status, with full compliance expected by 2028s.
	Summary of tailings management systems and governance structure used to monitor and maintain the stability of tailings storage facilities	EM-MM-540a.2	Tailings Infrastructure and Monitoring: Strengthening Safety Systems and Aligning with Global Standards Note: The disclosure for EM-MM-540a.2 is partial, as the report does not include a comprehensive summary of governance systems and structures in line with GISTM Principles 7–11. Additionally, it lacks information on the frequency of risk assessments and independent technical reviews. While monitoring systems and stability measures are described, the report does not clearly link these to the GISTM Principles or provide an overview of the governance structure from site level to senior management.
	Approach to development of Emergency Preparedness and Response Plans (EPRPs) for tailings storage facilities	EM-MM-540a.3	Tailings Infrastructure and Monitoring: Strengthening Safety Systems and Aligning with Global Standards Note: The disclosure for SASB EM-MM-540a.3 is partial, as the report does not provide a detailed description of the approach to developing Emergency Preparedness and Response Plans (EPRPs) specifically for Tailings Storage Facilities. It also lacks information on stakeholder engagement in the development or testing of these plans and does not specify the frequency of emergency plan testing or evacuation drills. Additionally, the mention of seismic sensors for early warning is not sufficient to demonstrate a comprehensive EPRP approach

Activity Metrics

Activity Metric	Code	Location and Notes
Production of (1) metal ores and (2) finished metal products	EM-MM-000.A	Economic Impact in Numbers.
Total number of employees, percentage contractors	EM-MM-000.B	Engaging External Expertise: Partnering with Non-Staff Professionals

Appendix 7

IFRS S2 Content Index

Topic	Metric	Code	Location and Notes
Governance	Disclosure of governance processes, controls, and oversight procedures used by the entity to monitor, manage, and oversee climate-related risks and opportunities, enabling users to understand how climate governance is embedded in the organization.	IFRS S2 — 5	Climate Change Governance: Upholding Transparency and Accountability in Addressing Climate Challenge Note: The information is partially disclosed due to the lack of detailed information on how and how often the Board of Directors or senior management are informed about climate risks and opportunities. While weekly meetings with the CEO and department heads occur, it is unclear how regularly and in detail climate risks are discussed. ZCMC acknowledges that the current governance model does not include a formal process for senior management or staff to report directly to the Board on sustainability issues, which constitutes a gap in the required accountability process under IFRS S2 5-7
Governance	Identification of the governance body or individuals responsible for climate-related oversight, including how responsibilities, skills, information flow, strategic input, target-setting, and integration with management controls are structured and executed.	IFRS S2 — 6	Climate Change Governance: Upholding Transparency and Accountability in Addressing Climate Challenge
Governance	Disclosure of how the entity avoids duplication by integrating governance reporting across sustainability-related risks and opportunities.	IFRS S2 — 7	Climate Change Governance: Upholding Transparency and Accountability in Addressing Climate Challenge
Strategy	The objective of climate-related financial disclosures on strategy is to enable users of general purpose financial reports to understand an entity's strategy for managing climate-related risks and opportunities.	IFRS S2 — 8	Navigating Climate-Related Risks and Opportunities for Long-Term Resilience
Strategy	Disclosure of climate-related risks and opportunities and their current and anticipated impacts on the entity's business model, value chain, strategy, financial position, performance, cash flows, and climate resilience over short, medium, and long term.	IFRS S2 — 9	Navigating Climate-Related Risks and Opportunities for Long-Term Resilience
Strategy	Describe climate-related risks and opportunities that could reasonably be expected to affect the entity's prospects	IFRS S2 — 10(a)	Navigating Climate-Related Risks and Opportunities for Long-Term Resilience
Strategy	Explain, for each climate-related risk the entity has identified, whether the entity considers the risk to be a climate-related physical risk or climate-related transition risk	IFRS S2 — 10(b)	Dual Approach to Risk Management, addressing Physical and Transition Risks for Sustainable Mining Operations
Strategy	Specification of the expected time horizon (short, medium, or long term) over which the effects of each identified climate-related risk and opportunity are anticipated to occur	IFRS S2 — 10(c)	Navigating Short, Medium, and Long-Term Challenges for Sustainable Operations
Strategy	Explanation of how the entity defines 'short term', 'medium term', and 'long term', and how these timeframes align with the entity's strategic planning and decision-making horizons.	IFRS S2 — 10(d)	Navigating Short, Medium, and Long-Term Challenges for Sustainable Operations
Strategy	Use of all reasonable and supportable information available at the reporting date, including past events, current conditions, and forecasts to identify climate-related risks and opportunities expected to affect the entity's prospects	IFRS S2 — 11	Climate Change Strategy: Advancing Resilience and Opportunity Through Strategy Development.
Strategy	Consideration of industry-based disclosure topics from the IFRS S2 Industry-based Guidance when identifying applicable climate-related risks and opportunities.	IFRS S2 — 12	Climate Change Strategy: Advancing Resilience and Opportunity Through Strategy Development.
Strategy	Description of the current and anticipated effects of climate-related risks and opportunities on the entity's business model and value chain	IFRS S2 — 13(a)	Navigating Climate-Related Risks and Opportunities for Long-Term Resilience
Strategy	Identification of areas within the business model and value chain where climate-related risks and opportunities are most concentrated, such as specific geographies, facilities, or asset types.	IFRS S2 — 13(b)	Climate-Related Impacts Across Operations and Value Chain
Strategy	Disclosure of how the entity plans to achieve its climate-related targets, including any greenhouse gas emissions targets.	IFRS S2 — 14(a-v)	Climate Change Strategy: Advancing Resilience and Opportunity Through Strategy Development. Navigating Climate-Related Risks and Opportunities for Long-Term Resilience GHG Emissions: Targeting the Improvement in Production Efficiency
Strategy	Quantitative and qualitative information on the progress made against climate-related plans disclosed in previous reporting periods	IFRS S2 — 14(c)	GHG Emissions: Targeting the Improvement in Production Efficiency

Appendix 8: Contacts

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