

## **HUMAN RIGHTS POLICY OF JSC "NAVOI MINING AND METALLURGICAL COMPANY"**

### **1. GENERAL PROVISIONS**

Joint Stock Company "Navoi Mining and Metallurgical Company" (hereinafter referred to as NMMC, the Company) recognizes that each person is unique and valuable, and places particular emphasis on fostering a culture of equality and respect that facilitates the development of the potential of each employee.

As a major employer, the Company strives not only to provide favorable and decent working conditions, but also to actively protect and promote respect for human rights.

This Policy reflects NMMC's commitment to respecting human rights and, together with the principles set out in the Employee Code of Ethics, the Diversity and Inclusion Policy and other internal documents of the Company, forms a unified approach to the social responsibility of NMMC.

The Policy comes into force upon approval and is subject to publication on the Company's official website.

### **2. STRATEGIC OBJECTIVES**

The Company's goal is to ensure respect for human rights in all areas of its operations, creating a fair, safe, and supportive environment for employees, partners, local communities, and other stakeholders. The Company has identified the following priority objectives:

- Ensuring respect and protection of human rights at all stages of the Company's activities;
- prevention of discrimination, violence, forced and child labor;
- creating safe, fair and ethical working conditions;
- developing a corporate culture based on respect for human rights and spreading commitment to these principles throughout value chains;
- interaction with local communities and contribution to their socio-economic development.

### **3. SCOPE OF APPLICATION**

The provisions of the Policy apply to all interested parties, including:  
employees of the Company;  
local communities in the regions where the Company operates;  
business partners of the Company.

The provisions of the Policy apply to all business processes and activities of NMMC without exception.

### **4. REGULATORY AND LEGAL FRAMEWORK**

NMMC is guided by the principles enshrined in:  
the legislation of the Republic of Uzbekistan;  
the UN Universal Declaration of Human Rights;  
the UN International Covenant on Civil and Political Rights;  
the UN International Covenant on Economic, Social and Cultural Rights;  
the International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work;  
the UN Guiding Principles on Business and Human Rights;  
the OECD Guidelines for Responsible Business Conduct;  
the International Finance Corporation (IFC) Performance Standards;  
the International Organization for Standardization ISO 26000:2012 on Social Responsibility;

the UN Global Compact (UNGC) Principles;  
the Principles for Responsible Mining of the International Council on Mining and Metals (ICMM);  
the Responsible Gold Mining Principles (RGMP).

## **5. KEY PRINCIPLES**

### **5.1. Management and Responsibility**

The company prioritizes human dignity, health and safety, recognizing the rights and freedoms of every person as an absolute value.

In its relationships with employees, local communities, partners, and other stakeholders, the Company adheres to the principles of ethics, equality, non-discrimination, and respect for the priority of health, safety, and well-being of people.

NMMC is responsible for the impact of its activities on society, the environment and employees.

Human rights are observed in strict accordance with the legislation of the Republic of Uzbekistan and international standards. All management decisions and actions are taken taking into account the principles of human rights and the rule of law.

Every manager and employee are personally responsible for upholding human rights in their work. Violations are not concealed; they are openly addressed and addressed in accordance with established procedures.

The Company ensures the integration of human rights objectives and the provisions of this Policy into all strategic and operational documents, as well as into all business processes of NMMC.

### **5.2. Risk assessment and management**

Ensure that human rights risks are regularly assessed across all aspects of operations, including working conditions, impacts on local communities, and supplier and contractor practices.

Maintaining a human rights due diligence system that includes regular monitoring of compliance, record-keeping and reporting on human rights issues.

Prompt elimination of identified violations and negative consequences related to human rights.

Implementation of programs and activities aimed at respecting, protecting and promoting human rights in the Company's operations.

### **5.3. Integration of principles into the company's internal processes**

Ensuring the inclusion of the provisions of this Policy in HR procedures, contracts with suppliers and contractors, as well as in internal regulations and instructions on labor protection.

Ensuring the implementation of risk management systems and internal control mechanisms for compliance with the principles of the Human Rights Policy.

### **5.4. Training and awareness raising**

Conducting employee training to increase awareness of human rights, the principles of their protection, as well as the complaints and feedback mechanisms in place within the Company.

### **5.5. Monitoring, auditing and reporting**

Conducting internal audits of compliance with the provisions of this Policy.

Develop performance indicators, including number of complaints, employee satisfaction levels, and training coverage.

Providing regular reports on the impact of the Company's activities on human rights, as well as on the results of eliminating violations and implementing internal regulations, to the Company's senior management and employee representatives.

### **5.6. Interaction with stakeholders**

Ensuring that the provisions of this Policy and necessary clarifications are communicated to all employees and external stakeholders.

Maintaining regular consultations with representatives of workers, local communities, government agencies and other stakeholders.

Engaging with government agencies and external stakeholders to jointly address social and labor issues within the framework of implementing human rights principles and achieving the Company's strategic goals.

## **6. TASKS AND IMPLEMENTATION MECHANISM**

### **6.1. Protection of workers' labor rights**

NMMC views the protection of labor rights as a key element of sustainable development and social responsibility. The company strives to create a safe, fair, and inclusive work environment, ensuring compliance with employee labor rights and the provisions of the Collective Agreement.

#### **Decent working conditions:**

ensuring stable and fair remuneration of wages corresponding to qualifications, experience and legal requirements;

compliance with working hours standards, provision of paid vacations, days off and breaks;

Ensuring occupational safety: conducting regular briefings, providing personal protective equipment, conducting medical examinations and preventing occupational diseases.

#### **Freedom of association and collective bargaining:**

respect for the right of workers to form and participate in trade unions, associations and other forms of representation;

supporting constructive dialogue between employers and employee representatives;

prevention of pressure, repression or discrimination for participation in trade union activities.

#### **Prohibition of forced and child labor:**

categorical exclusion of any forms of forced labor;

prohibition of employing persons under the age established by law;

a categorical prohibition of psychological pressure, bullying, mobbing, harassment and other forms of violence in the workplace;

Conducting internal audits and monitoring to identify risks of unfair employment practices and ensure compliance with HR policy provisions.

#### **Protection from discrimination and ensuring equal opportunities:**

ensuring freedom from discrimination on the basis of race, sex, age, color, national or social origin, religious beliefs, physical disabilities, marital status or other status;

making decisions on hiring, promotion, training and dismissal solely on the basis of professional qualities and the requirements of labor legislation;

providing equal treatment and equal opportunities to all employees.

#### **Fight against corruption and abuse:**

prohibition of using official powers for purposes contrary to human rights, as well as committing or concealing actions that may cause harm to workers, local communities or the environment.

### **6.2. Respect for the rights of local communities**

NMMC recognizes its responsibility to the population living in the regions where it operates and strives for respectful, transparent, and mutually beneficial interactions with local communities.

#### **Participation and information:**

conduct public hearings and consultations when implementing new projects;

ensure access to information on the impact of activities on the environment, health and well-being of the population;

take into account the opinions and suggestions of local residents when making management decisions.

#### **Environmental and social safety:**

minimize negative impacts on the environment through emission control, waste management and land reclamation;

Conduct impact assessments on local communities and take preventative measures if potential negative impacts are identified;

support programs to improve infrastructure and expand access to basic services and social benefits.

**Social investments:**

implement projects in the fields of education, healthcare, culture and sports;

support the development of small and medium-sized businesses, promoting the growth of entrepreneurial activity;

promote employment for local people and provide vocational training programs.

**Respect for cultural heritage:**

to preserve historical monuments, traditions and customs of local communities;

prevent the destruction of cultural heritage sites during construction and mining operations.

**6.3. Relationships with business partners**

NMMC strives to ensure that its entire production and sales supply chain meets high standards of ethics and human rights. The company recognizes that its responsibility for respecting human rights extends beyond its own operations and the immediate activities of its production units.

**Ethical supplier selection:**

conduct preliminary assessments of suppliers for compliance with labor, environmental, and anti-corruption standards;

establish selection criteria that include human rights commitments.

**Contractual obligations**

include provisions on human rights in contracts with contractors and suppliers;

ensure that partners are committed to providing accurate information about their subcontractors, supply chains, and manufacturing practices.

**Monitoring and audit**

Conduct regular audits of supplier activities, including random audits and visits to production sites;

apply appropriate measures in the event of violations, up to and including suspension of cooperation or termination of the contract.

## **7. SUPPORT HUMAN RIGHTS DUE DILIGENCE**

Human rights due diligence is a process aimed at promptly identifying, preventing, mitigating and addressing the adverse impact of the Company's activities on human rights.

NMMC continuously monitors the actual and potential impact of its activities on human rights both within the Company and in partnerships and supply chains.

The due diligence process involves assessing human rights risks and impacts, documenting them, and implementing corrective actions. The company integrates the results of this process into its management system and makes decisions based on the identified risks.

The company regularly monitors the effectiveness of the measures taken and informs stakeholders about actions aimed at eliminating and preventing human rights violations.

### **7.1. Human Rights Impact Assessment**

NMMC is committed to conducting regular Human Rights Impact Assessments (HRIAs) of its activities. The purpose of these assessments is to promptly identify, prevent, and minimize the risks of human rights violations in all areas of the Company's operations.

**Human rights impact assessment includes:**

identifying human rights risks associated with the activities of the Company and its partners, including interactions with vulnerable groups and local communities;

conducting periodic human rights impact assessments for its own employees, local community representatives, and workers in supply chains and value creation;

development and implementation of measures to manage identified risks and reduce negative impacts depending on their degree and probability;

implementation of regular monitoring and control of compliance with fundamental human rights, as well as the effectiveness of the measures implemented to manage risks and impacts.

## **7.2. Feedback and troubleshooting mechanisms**

NMMC places particular emphasis on providing and maintaining a comprehensive feedback mechanism that allows stakeholders to report any issues or violations anonymously, without fear of bias or retaliation.

The Company has a **Department for Monitoring and Coordinating Work with Appeals from Individuals and Legal Entities**, which ensures the receipt and consideration of appeals from both internal and external stakeholders on any issues, including possible human rights violations.

### **Complaint system:**

provide a transparent and accessible mechanism for filing complaints about human rights violations;

provide an opportunity for any person to file a complaint without fear of reprisal or pressure; maintain the effective functioning of all channels for submitting appeals, including:

helpline;

mail messages;

email;

virtual assistant bot on the Company's website;

virtual reception on the Company's website;

trust boxes in production units;

reception of oral and written requests by the staff of the appeal service;

Reception days for heads of production departments;

personal reception of citizens by the Chairman and members of the Board of the Company.

### **Consideration of appeals:**

All requests are reviewed in accordance with the Company's internal procedures. If violations are confirmed, measures are taken to correct them, taking into account all the circumstances. The Company maintains a register of requests, analyzes each specific situation, and provides feedback to the complainant.

### **Compensation and restoration:**

In the event that a human rights violation is confirmed, the Company provides copyright holders with proportionate assistance to restore violated rights and adequate compensation for damages caused.

### **Access to legal remedies:**

In order to implement the provisions of this Policy, the Company provides interested parties with access to effective legal remedies, as well as the necessary support and protection of complainants from any forms of pressure or harassment .

## **8. RESPONSIBILITY**

The management of NMMC is responsible for the implementation, compliance, and effective operation of the provisions of this Policy, as well as for providing the necessary resources to achieve the Company's goals in the area of protecting and respecting human rights.

The Company's management ensures openness, transparency and accountability in matters related to the observance of human rights in all areas of its activities.

### **Control bodies and executors.**

Control over the implementation of the provisions of this Policy is carried out **by the Deputy Director General for Personnel and Administrative Issues**.

Heads of structural divisions and appointed responsible employees ensure the fulfillment of the Company's obligations in the area of human rights in accordance with their functional responsibilities and areas of activity.

### **Monitoring and reporting.**

Responsible persons regularly monitor compliance with this Policy, evaluate the effectiveness of the measures taken and the complaints handling mechanism, and submit reports to the Company's senior management and stakeholders.

Reporting on human rights compliance is included in the regular corporate reporting of NMMC.

**Responsibility for implementing the provisions of this policy is distributed as follows:**

<b>Human rights</b>	<b>The unit responsible for enforcing the provisions of this policy and protecting human rights</b>
<b>PROTECTION OF LABOR RIGHTS</b>	
Decent working conditions	Human Resources Management Department of Occupational Health, Safety and Environment (ESG)
Freedom of association and collective bargaining	Chairman and members of the board Directors of production units Human Resources Management Legal Department
Prohibition of forced and child labor	Human Resources Management Legal Department Compliance Service
Non-discrimination and equal opportunities	Human Resources Management Legal Department Compliance Service
<b>RIGHTS OF LOCAL COMMUNITIES</b>	
Participation and information	Investment and Capital Construction Department Directors of production units
Environmental and social safety	Directors of production units
Social investments	Chairman and members of the board Department of Corporate Social Responsibility
Respect for cultural heritage	The relevant departments and divisions, within the scope of their powers and compliance with legal requirements
<b>RIGHTS OF BUSINESS PARTNERS</b>	
Ethical supplier selection	Main Directorate for the Organization and Improvement of Procurement Methodology Compliance Service
Contractual obligations	Main Directorate for the Organization and Improvement of Procurement Methodology
Monitoring and auditing partners	Main Directorate for the Organization and Improvement of Procurement Methodology Compliance service
<b>IMPLEMENTATION OF A DUE DILIGENCE MECHANISM</b>	
Conducting a human rights impact assessment	Department of Sustainable Development and Environment (ESG)
Feedback and troubleshooting mechanisms	Department for control and coordination of work with appeals from individuals and legal entities Appeals Committee The relevant departments and divisions, within the scope of their powers and compliance with legal requirements
<b>INTEGRATION OF PRINCIPLES INTO THE COMPANY'S INTERNAL PROCESSES</b>	
Training and awareness raising	Training Department Department of Sustainable Development and Environment (ESG)

<b>Human rights</b>	<b>The unit responsible for enforcing the provisions of this policy and protecting human rights</b>
Monitoring, auditing and reporting	Department of Sustainable Development and Environment (ESG)
Interaction with stakeholders	The relevant departments and divisions, within the scope of their powers and compliance with legal requirements

## **9. FINAL PROVISIONS**

This Policy is subject to regular review (at least once every three years), as well as in the event of:

- changes in applicable legislation;
- in case of significant changes in the Company's operating activities;
- in order to comply with best practices.

This Policy enters into force upon its approval by order of the Chairman of the Management Board - General Director of NMMC.

In the event that any provisions of this Policy, for any reason, conflict with the mandatory requirements for the Company established by the legislation of the Republic of Uzbekistan (imperative norms), such provisions shall lose their legal force and until the appropriate changes are made to this Policy. In these cases, the Company is guided by the norms of the current legislation of the Republic of Uzbekistan.

The Sustainable Development and Environment (ESG) Department of the Transformation office of NMMC is responsible for updating this Policy.