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**APPROVED**  
by the Chairman of the Management Board  
of JSC "Navoiyazot"  
May 6, 2026

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## **HUMAN RIGHTS POLICY**

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## Terms and definitions

**Gender equality** —Ensuring equal rights, opportunities and conditions for women and men in all areas of the Company's activities, including hiring, remuneration, career growth, training and participation in management.

**Discrimination** —any distinction, exclusion, restriction or preference based on sex, age, race, ethnicity, language, religion, political opinion, disability, marital status or other status that results in a violation of equality of opportunity or treatment.

**Debt bondage** —a form of forced labour in which a person is required to work to pay off a debt, with the working conditions and repayment terms being unspecified or not actually allowing for the debt to be repaid.

**Complaint** —an appeal with a demand for the restoration of violated rights, freedoms and the protection of legitimate interests.

**Inclusion** —a process that ensures equal opportunities for all, regardless of their differences, and creates an environment in which all can participate and contribute.

**Insider information** —information about the financial position, operating results or strategic plans of the Company that is not subject to public disclosure and may affect the market value of securities or the organization's reputation.

**Trade secret** —information of commercial value in the field of science and technology, technology, production, finance and economics, as well as in other areas due to anonymity for third parties, which is not legally freely accessible, the owner of this information takes measures to protect its privacy.

**Confidential information** — information concerning the activities of the Company, its clients, partners and employees, access to which is restricted by internal procedures.

**Conflict of interest**—a situation in which a personal (direct or indirect) interest influences or may influence the proper performance of official duties by an employee of the enterprise, as well as a conflict between a personal interest and the rights and legitimate interests of the Company.

**Corporate culture** —a set of values, norms, principles and models of behavior shared by the Company's employees.

**Corporate Social Responsibility (CSR)** —a business approach in which companies consider the social, environmental, and economic impacts of their activities and strive for sustainable development.

**Culture of diversity, equality and inclusion**— are values and practices aimed at creating a work environment that values human diversity and ensures equal opportunities for all employees, regardless of their characteristics.

**Monitoring and control** —processes aimed at assessing the implementation of policies and standards, as well as identifying and eliminating violations.

**Responsibility** —the commitment of employees and managers to comply with established norms and principles and to respond to human rights violations.

**Persecution or repression** —any negative action against an employee who reported instances of discrimination, harassment or human rights violations.

**Forced labour** —any work or service required of a person under threat of punishment and performed without voluntary consent. This includes practices such as forced recruitment, document retention, restrictions on freedom of movement, and threats of punishment.

**Zero tolerance principle for violence**— the Company’s position, which excludes any forms of physical, psychological or sexual violence, threats and pressure against employees, partners and other stakeholders.

**The principle of transparency**— a principle of conducting business in which all internal and external processes of a company are carried out openly, documented, and available for inspection by interested parties.

**Harassment** —unwelcome behavior (verbal, nonverbal, or physical) aimed at humiliating a person's dignity and creating a hostile, humiliating, or threatening work environment. This includes psychological pressure, bullying, insults, harassment, and sexual harassment.

**Freedom of association** —the right of workers to freely and voluntarily form trade unions and engage in collective bargaining without fear of reprisal.

**KPI system** —a system of key performance indicators (KPIs) used by a company to measure and evaluate the degree of achievement of strategic and operational goals.

**Vulnerable groups** —categories of workers who may be at increased risk of discrimination or exploitation.

**Favoritism** —favoritism is the practice of unjustified preference for individual employees or groups of employees based on personal motives, placing their interests above those of other employees or the team as a whole. Favoritism can manifest itself in biased selection and placement of personnel, promotions, bonuses, vacations, business trips, and other benefits based not on professional merit, but on subjective or personal reasons.

**ESG factors** —Environmental, Social and Governance aspects that influence a company's sustainable development, its long-term value and investment attractiveness.

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## 1. Introduction

“Navoiyazot” JSC (hereinafter referred to as the Company) Human Rights Policy confirms the Company's commitment to responsible and ethical business practices and the integration of sustainable development principles. It is based on international standards and applies to all employees, contractors, and third parties. The Policy aims to prevent discrimination, harassment, and violence, ensuring equal opportunities for all.

### 1.1 Objective of the policy

“Navoiyazot” JSC (reaffirms its commitment to protecting human rights, conducting business responsibly and ethically, and integrating sustainable development principles into all aspects of its operations.

The policy is based on:

- UN Universal Declaration of Human Rights;
- International Covenant on Civil and Political Rights;
- Convention for the Protection of Human Rights and Fundamental Freedoms;
- International Covenant on Economic, Social and Cultural Rights;
- UN Guiding Principles on Business and Human Rights;
- International Labour Organization Declaration on Fundamental Principles and Rights at Work;
- UN Declaration on the Rights of Indigenous Peoples;
- UN Voluntary Principles on Security and Human Rights;
- ILO Forced Labour Convention (No. 29);
- ILO Convention on the Elimination of Forced Labour (No. 105);
- ILO Minimum Age Convention (No. 138)
- ILO (International Labour Organization) Declaration on Fundamental Principles and Rights at Work;
- Legislation of the Republic of Uzbekistan, including:
  - Constitution of the Republic of Uzbekistan<sup>1</sup>
  - Labour Code of the Republic of Uzbekistan<sup>2</sup>
  - Law of the Republic of Uzbekistan "On Combating Human Trafficking" No. LRU-154 (2008)<sup>3</sup>
  - Law of the Republic of Uzbekistan "On Labour Protection" LRU-328 (2016)<sup>4</sup>
  - Law of the Republic of Uzbekistan "On Employment of the Population" No. LRU-642 (2020)<sup>5</sup>
  - Law of the Republic of Uzbekistan "On Equal Rights and Guarantees for Women and Men" No. LRU-562 (2019)<sup>6</sup>
  - Law of the Republic of Uzbekistan "On the Rights of Persons with Disabilities" No. LRU-641 (2020)<sup>7</sup>

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<sup>1</sup>[Constitution of the Republic of Uzbekistan](#)

<sup>2</sup>[Labour Code of the Republic of Uzbekistan](#)

<sup>3</sup>[Law of the Republic of Uzbekistan "On Combating Human Trafficking"](#)

<sup>4</sup>[Law of the Republic of Uzbekistan "On Labor Protection"](#)

<sup>5</sup>[Law of the Republic of Uzbekistan "On Employment of the Population"](#)

<sup>6</sup>[Law of the Republic of Uzbekistan "On Equal Rights and Guarantees for Women and Men"](#)

<sup>7</sup>[Law of the Republic of Uzbekistan "On the Rights of Persons with Disabilities"](#)

- Law of the Republic of Uzbekistan "On Appeals of Individuals and Legal Entities" No. LRU-378 (2014)<sup>8</sup>
- Law of the Republic of Uzbekistan "On Trade Unions" No. LRU-588 (2019)<sup>9</sup>
- Law of the Republic of Uzbekistan, No. 3PY-1002, November 15, 2024 "On the Commissioner of the Oliy Majlis of the Republic of Uzbekistan for Human Rights (Ombudsman)"<sup>10</sup>
- Decree of the President of the Republic of Uzbekistan, No. UP-6012, June 22, 2020 "On approval of the National Strategy of the Republic of Uzbekistan on Human Rights".<sup>11</sup>
- Joint Resolution of the Kengash of the Legislative Chamber of the Oliy Majlis of the Republic of Uzbekistan and the Kengash of the Senate of the Oliy Majlis of the Republic of Uzbekistan, No. 402-V, January 29, 2025 "On the establishment of a commission for the observance of constitutional human rights and freedoms"<sup>12</sup>
- Resolution of the President of the Republic of Uzbekistan, No. PD-46, February 7, 2023 "On approval of the National Program for Human Rights Education in the Republic of Uzbekistan"<sup>13</sup>

## 1.2 Scope of application

The Policy applies to all employees, contractors, subcontractors, suppliers, and any third parties acting on behalf of the Company.

## 1.3 Commitments and Principles

We commit ourselves to comply with international human rights principles. We strictly adhere to legal requirements and the principles enshrined in applicable regulatory and international documents. We do not tolerate, facilitate, or profit from any form of human rights abuse, ensuring that our activities meet high standards of ethics and responsibility.

The company undertakes to:

- Guarantee equal opportunities and strictly prohibit any form of unlawful discrimination, harassment, persecution or reprisal, ensuring the protection of vulnerable groups.
- Develop a culture of diversity, equality and inclusion in which every employee is valued, respected and has equal opportunities to reach their potential.
- Provide a work environment free from violence, intimidation, and other threats, and guarantee safe and fair working conditions, including fair wages and equal remuneration for work of equal value, compliance with working hours standards, and the provision of paid leave.

<sup>8</sup>[Law of the Republic of Uzbekistan "On Appeals of Individuals and Legal Entities"](#)

<sup>9</sup>[Law of the Republic of Uzbekistan "On Trade Unions"](#)

<sup>10</sup>[Law of the Republic of Uzbekistan, No. 3PY-1002, November 15, 2024 "On the Commissioner of the Oliy Majlis of the Republic of Uzbekistan for Human Rights \(Ombudsman\)"](#)

<sup>11</sup>[Decree of the President of the Republic of Uzbekistan, No. UP-6012, June 22, 2020 "On approval of the National Strategy of the Republic of Uzbekistan on Human Rights"](#).

<sup>12</sup>[Joint Resolution of the Kengash of the Legislative Chamber of the Oliy Majlis of the Republic of Uzbekistan and the Kengash of the Senate of the Oliy Majlis of the Republic of Uzbekistan, No. 402-V, January 29, 2025 "On the establishment of a commission for the observance of constitutional human rights and freedoms"](#)

<sup>13</sup>[Resolution of the President of the Republic of Uzbekistan, No. PP-46, February 7, 2023 "On approval of the National Program for Human Rights Education in the Republic of Uzbekistan"](#)

- Recognize and support freedom of association, the right to collective bargaining and freedom of expression without fear of persecution.
- Completely prohibit forced, bonded, or involuntary labour, as well as any practices that restrict an employee's freedom, including the withholding of documents, the charging of recruitment fees, or deposits.
- Strictly enforce the prohibition of child labour by meeting the minimum age requirements set by national and international standards and applying a more stringent standard where there is a discrepancy.

## 1.4 Approach to Human Rights Protection: Standards, Monitoring and Engagement

To fulfill these obligations, we are implementing a comprehensive approach, including:

- **International standards and principles**— guidance on the UN Universal Declaration of Human Rights, the UN Guiding Principles on Business and Human Rights, the ILO Declaration on Fundamental Principles and Rights at Work, the Responsible Care program, as well as internal policies and procedures.
- **Applicability**— the policy applies to all employees of the Company, subsidiaries, joint ventures with majority participation, contractors, subcontractors and all third parties acting on behalf of the Company.
- **Expectations from business partners**— Partners are obligated to respect human rights and labour standards and to prevent any violations in their operations and supply chain.
- **Stakeholder engagement**— regular engagement with communities, including vulnerable groups, to identify and address problems, and incorporate feedback into policy development and adjustments.
- **Education**— mandatory annual training for all employees on human rights, the code of conduct, and specialized topics (risk assessment, supplier audit, interaction with vulnerable groups).
- **Complaint channels**— accessible and confidential complaint mechanisms (hotline, compliance communication channel, online form, mail), protection from harassment and reprisals for those who report violations in good faith.
- **Monitoring and control**— regular internal audit and, if necessary, external verification of compliance with obligations, disclosure of progress in ESG reporting.
- **Zero Harm Culture** — systematic implementation of the principle of “zero injuries, incidents and accidents” as the basis of occupational safety.

## 2. Human Rights Priorities and Commitments

### 2.1 Prohibition of child labour

“Navoiyazot” JSC does not accept or practice child labour. The company does not employ individuals under the minimum age established by the labour legislation of the Republic of Uzbekistan, which in any case is not younger than 15 years of age (Page 118 of the Labour Code of the Republic of Uzbekistan, "Age of Employment").<sup>14</sup>

JSC “Navoiyazot” strictly adheres to the requirements of the chapter "Features of the legal regulation of the labour of employees under the age of 18"<sup>15</sup>(Pages 411–422 of the Labour Code of the Republic of Uzbekistan), including:

- guarantees upon hiring (page 411),
- prohibition on certain types of work (Page 412),
- labour rights (page 413),
- mandatory medical examinations (Page 414),
- reduced working hours (Page 415),
- duration of daily work (Page 416),
- prohibition of sending on business trips, engaging in overtime work, working at night, on weekends and holidays (Page 417),
- annual extended labour leave (Page 418),
- production standards (Page 419),
- remuneration (Page 420),
- additional guarantees upon termination of an employment contract (Page 421),
- termination of an employment contract at the request of parents/authorized bodies (Page 422).

Industrial internships for individuals under 18 years of age are permitted only if working hours restrictions and other safeguards for minors are fully observed. Employment of individuals under 18 in hazardous work that poses a threat to health, safety, or moral standards is unacceptable. «Navoiyazot» JSC supports legitimate internship/practice programs that comply with the laws and regulations of the Republic of Uzbekistan, as well as national and international standards: appropriate controls are ensured (maintaining records, checking training partners, protecting the rights of interns/trainees), and the necessary support and training are provided.

### 2.2 Prohibition of forced labour

We prohibit all forms of forced labour, including actions using threats, force, kidnapping, or deception to obtain labour or services. Debt bondage, forced labour, and any participation in human trafficking are prohibited. We do not forcibly restrict workers' freedom within our premises or hinder their lawful access to or exit from their workplace.

We comply with the laws of the Republic of Uzbekistan and international legislation prohibiting slavery and human trafficking, including the Law of the Republic of Uzbekistan dated April 17, 2008, No. LRU-154 "On Combating Human Trafficking." We collaborate with suppliers to eliminate modern slavery, forced labour, and human trafficking in our supply chain.

<sup>14</sup>[Labour Code of the Republic of Uzbekistan, Article 118.](#)

<sup>15</sup>[Labour Code of the Republic of Uzbekistan, Chapter 45 "Features of legal regulation of labor of employees under 18 years of age" \(Articles 411–422\).](#)

## **2.3 Freedom of association**

We support and respect workers' rights:

- To freely and voluntarily establish and join trade unions of their choice;
- Participate in collective bargaining and peaceful assemblies in accordance with applicable law;
- Freely express opinions and raise issues related to working conditions without fear of discrimination or reprisal. Employees and their representatives have the opportunity to communicate openly and share ideas and concerns with management.

## **2.4 Working hours, wages and benefits**

Work schedules, breaks, holidays, and vacations are determined in strict accordance with the labour legislation of the Republic of Uzbekistan, internal labour regulations, and other local labour regulations. We pay compensation to employees in accordance with all applicable laws on wages, overtime pay, and statutory benefits. The working hours and schedule are communicated to each employee before signing the employment contract. All employees have written employment contracts and are free to terminate their employment within the timeframes established by law. A payroll statement with sufficient information for verifying payments is provided for each pay period. We guarantee the right to annual leave, sick leave, parental leave (in the event of the birth or adoption of a child), and vacation leave for employees combining work with study in secondary vocational and higher education programs in accordance with the law.

## **2.5 Discrimination and harassment**

We provide equal opportunities for everyone without discrimination or harassment based on gender, age, race, nationality, language, social origin, criminal record of family members, property and official status, place of residence, religious affiliation, beliefs, membership in public associations, and other circumstances unrelated to professional merit and performance, in accordance with applicable law. We respect the freedom of thought, conscience, and religion of employees and business partners and strive for gender equality. Recruitment and promotion are conducted based on principles of transparency and the prevention of favoritism. Our Management Policy stipulates that in recruitment, placement, and promotion, the interests of individuals do not take precedence over the interests of others; management decisions are made openly and objectively.

We also do not tolerate any form of harassment, including sexual, psychological, or other unwanted actions that create a hostile or unacceptable work environment.

## **2.6 Inclusion and Diversity**

Creating an inclusive work culture based on respect, equality, and social justice is one of our Company's priorities. All decisions regarding hiring, compensation, incentives, and career development are made solely based on the professional merits and experience of employees, without regard to gender, age, race, nationality, or other individual characteristics. The principles of diversity and inclusion are enshrined in our internal documents and collective bargaining agreement, guaranteeing equal opportunities for all employees and compliance with the key labour principles of the International Labour Organization (ILO).

We support the advancement of women and members of disadvantaged groups, ensuring equal access to management positions and professional development opportunities. The Women's Council and the

Trade Union Committee play a vital role in promoting gender balance, protecting women's rights, and creating a fair and safe work environment.

**2.7 Environmental protection, safety and labour protection**

Environmental protection, safe working conditions, and respect for human rights are interrelated elements of sustainable development and corporate responsibility. Company employees are particularly exposed to risks associated with violations of environmental and occupational safety regulations, which can lead to injuries, occupational illnesses, and negative health impacts. International standards and regulations enshrine the right of every person to a safe working environment and favorable environmental conditions. Compliance with these standards reduces industrial and environmental risks and guarantees the enjoyment of fundamental human rights, enhancing trust in the company and its social responsibility.

We strictly adhere to environmental and labour standards, focusing on the sustainable use of natural resources, ensuring safe working conditions, and preventing pollution. We are committed to continuously improving our operations and reducing our negative impact on the environment. Our human rights protection policy is part of the guiding principles also enshrined in our Occupational Health and Safety Policy. Sustainability and the environment hold special place in our corporate values.

We have implemented the international standards ISO 14001 (environmental management system) and ISO 45001 (occupational health and safety management system), which enable us to systematically assess risks and strengthen operational resilience. Risk management takes into account ESG factors, including environmental impact. We set and regularly review goals and objectives in these areas.

**2.8 Confidentiality and personal data**

We strictly adhere to the rules for using confidential and insider information. Disclosure of information about the private lives of individuals or the activities of legal entities without their consent entails liability in accordance with established law. We determine the procedure for classifying information as a commercial secret and the terms of its use in accordance with the law. We ensure that individuals and legal entities have access to documents and materials affecting their rights, freedoms, and legitimate interests, provided they do not contain information constituting state secrets or other secrets protected by law. The personal data of employees and partners is processed in accordance with established procedures and measures to protect against unauthorized access.

### **3. Code of Corporate Responsibility (internal)**

#### **3.1 Respect for the individual**

We provide equal opportunities for all employees and prohibit discrimination, harassment, and persecution based on grounds unrelated to professional merit and performance. Our Company maintains a culture of respect, equal opportunity, and diversity, based on the dignity of every individual and the prohibition of any form of harassment. Respectful and professional relationships between employees and partners are a key principle of our operations and successful development. We respect freedom of thought, conscience, and religion and strive for gender equality.

#### **3.2 Safe working conditions**

We ensure the safety and health of our employees by creating working conditions that eliminate threats to life and health. Our Company adheres to the zero-harm principle, based on zero tolerance for injuries, threats, and violence in the workplace. We have implemented the ISO 45001 international occupational safety standard, confirming our commitment to high safety standards. We continually improve our health and safety processes, setting and regularly reviewing goals and objectives in this area.

#### **3.3 Labour rights and fair payment**

We strictly adhere to the labour laws of the Republic of Uzbekistan. Working hours, rest periods, holidays, and vacations are regulated by the Labour Code of the Republic of Uzbekistan and our company's internal regulations. We provide employees with fair compensation, all legally required benefits, annual leave, sick leave, parental leave, and vacations for combining work with study. All employees have written employment contracts and the right to terminate their employment within the legally established timeframes. Each employee is provided with a payroll statement with complete data for verification of accruals.

#### **3.4 Confidentiality and personal data**

We comply with the rules for processing the personal data of our employees and partners and ensure the protection of information from unauthorized access and misuse. The procedure for using confidential and insider information, as well as the classification of information as a trade secret and the terms of its use, are determined in accordance with the legislation of the Republic of Uzbekistan. Disclosure of information about the private lives of individuals or the activities of legal entities without their consent entails liability in accordance with established law.

### **4. Supplier/Partner Code of Conduct (external)**

#### **4.1 Expectations from suppliers**

We expect all our suppliers and partners to strictly adhere to international ESG standards, Uzbek legislation, and the principles enshrined in this Policy. Suppliers are obligated to respect human rights,

ensure occupational health and safety, and adhere to the principles of fair competition and ethical business conduct.

**4.2 Social responsibility**

Our suppliers and partners are committed to eliminating discrimination, harassment, human trafficking, and the use of child and forced labour in their supply chains. They are also responsible for ensuring safe working conditions and complying with environmental regulations.

**4.3 Supplier assessment and compliance monitoring**

We reserve the right to audit suppliers' activities and verify compliance with the established principles. If violations are detected, non-compliance may result in restrictive measures, including termination of cooperation.

**4.4. Supplier's obligations**

Suppliers are required to extend these standards to their subcontractors and other partners in the supply chain. They must also provide internal training to their staff on human rights, labour standards, occupational health and safety, and environmental protection.

## 5. Approach to risk assessment

### 5.1 Proactive risk assessment

We take a proactive approach to risk management, integrating risk assessment into procurement, recruitment, and contracting processes. We plan to implement a corporate risk management system based on the ISO 31000 international standard and the COSO Enterprise Risk Management (ERM) framework, which will integrate risk assessment and control into strategic planning, the KPI system, internal controls, and corporate culture. As part of this approach, we pay special attention to ESG factors, including respect for workers' rights and occupational safety. We have implemented the "three lines of defense" concept, which involves the development and implementation of control procedures and a unified methodology for risk identification and management. Figure 1 below presents the "three lines of defense" concept as implemented within the Company.



*Drawing 1. The "three lines of defense" concept*

### 5.2 Identification of vulnerable groups and geographies

We prioritize the identification and protection of vulnerable groups, such as children, migrants, and women. We do not tolerate child labour and ensure compliance with the Labour Code of the Republic of Uzbekistan regarding underage labour, including age restrictions, types of acceptable work, reduced working hours, and mandatory medical examinations. We also strictly prohibit forced labour, debt bondage, and human trafficking, ensuring the protection of migrant and other workers. Women and all employees are provided equal opportunities without discrimination based on gender, age, nationality, or other characteristics not related to professional merit.

When assessing and managing risks, we pay particular attention to ESG factors, including respect for workers' rights, ethics, transparency, and anti-corruption measures. Our management system also aims to promptly identify conflicts of interest at an early stage, which helps minimize associated risks. Furthermore, our categorization of violation reports allows us to highlight the most significant cases, including forced labour, discrimination, and child labour, strengthening our oversight of sensitive areas.

### **5.3 Assessment methods**

We use both internal and external controls to identify and assess risks. The company develops and maintains a risk map covering operational, legal, and other risks. Compliance with the Human Rights Protection Policy is regularly monitored through internal audits and analysis of communications received through communication channels, classifying them according to their significance.

We have implemented the international standards ISO 9001 (quality), ISO 14001 (environment), ISO 45001 (occupational health and safety), ISO 50001 (energy management), and ISO 37001 (anti-bribery), which form the basis for systematic risk assessment. We plan to further implement the ISO 31000 guide and the COSO ERM framework, which provide a more comprehensive approach to risk management. Our assessment methods are periodically reviewed, including stress testing, to ensure their relevance and effectiveness.

### **5.4 Response to identified risks**

We take corrective measures when human rights violations or risks are identified. Complaints and violations are reviewed promptly and objectively, with the participation of responsible managers. Depending on the situation, additional documents may be requested, on-site inspections may be conducted, and measures may be taken to restore violated rights and legitimate interests.

We collaborate with suppliers and contractors to address identified non-compliances, develop joint action plans, and monitor their implementation. In the event of serious or repeated violations, enforcement actions are taken, including warnings, restriction of cooperation, or contract termination.

A withdrawal notice does not relieve us of our obligation to address violations. Our officials are required to identify the causes of violations, address the conditions that contribute to their occurrence, and ensure recurrence is prevented. Risk response is aimed not only at eliminating specific violations but also at strengthening the human rights protection system in our operations and supply chain.

## **6. Human Rights Action Plan**

### **6.1 Continuous improvement system**

We strive for continuous improvement in the areas of human rights protection and sustainable development. We regularly review our policies and practices, setting and updating goals and objectives, focusing on safety, occupational health, and the prevention of negative environmental impacts.

Compliance with the Policy is verified by internal audits, and the management system is built on the principle of continuous monitoring. To assess performance, we implement performance indicators (KPIs), integrating them into corporate governance and strategic planning. The development of the risk management system is aimed at strengthening resilience and improving operational efficiency.

### **6.2 Targeted initiatives**

We implement targeted initiatives aimed at protecting and promoting human rights at Navoiyazot JSC. As part of these initiatives, we ensure adherence to the principles of inclusivity, gender equality, and equal opportunity. Collective agreements include commitments to non-discrimination, equal pay, and compliance with the key labour principles of the International Labour Organization (ILO), and the trade union committee oversees compliance.

We implement internal documents and mechanisms that enshrine commitments to non-discrimination, equality, and the creation of an inclusive and fair work environment, and ensure their continuous improvement in line with international best practices.

The Women's Council plays a special role, implementing measures to promote gender balance and protect women's rights. Its activities include outreach on domestic violence prevention, psychological training, medical examinations, and social support. We provide guarantees for women, including transfer to light work during pregnancy with pay retention, as well as access to wellness programs.

We also support vulnerable groups of employees. Additional social benefits, including flexible work arrangements and paid leave, are available for families with many children, single parents, and parents of children with disabilities. Employees with disabilities are offered shorter working hours and additional days off.

These initiatives reaffirm our commitment to equality, social justice and creating a safe and inclusive work environment.

### **6.3 Integration into business processes**

We integrate human rights protection into all key areas of our operations. Our HR management process includes provisions affirming the obligation to respect human rights for all employees and managers. In procurement, we extend the Policy's requirements to suppliers and contractors, requiring them to eliminate child and forced labour in their supply chains. In the area of ESG and sustainable development, we integrate human rights alongside environmental, social responsibility, transparency, and anti-corruption measures, forming the foundation of the Company's long-term sustainability.

## 7. Procedure for submitting and reviewing employee appeals

The procedure for handling inquiries (including complaints) at «Navoiyazot» JSC is carried out in accordance with internal regulations. Each incoming inquiry is subject to mandatory acceptance and review. We guarantee a complete, objective, and timely review of all reports related to human rights violations.

### 7.1 Supply channels

We accept inquiries from employees, suppliers, contractors, and other interested parties in oral, written, or electronic form. Inquiries may be submitted via:

- helpline (+998 79-224-41-11);
- form on the official website and corporate email: [office@navoiyazot.uz](mailto:office@navoiyazot.uz) and [referent@navoiyazot.uz](mailto:referent@navoiyazot.uz) ;
- Unified portal of interactive public services of the Republic of Uzbekistan;
- personal reception according to the approved schedule.

Employees can also contact their immediate supervisor or the Company's relevant committees.

### 7.2 Confidentiality and Protection from Reprisal

We ensure the confidentiality of all received reports. Access to information is limited to authorized individuals, and its disclosure is permitted only upon the lawful request of government agencies. The personal information of applicants is not disclosed during the review of reports.

We guarantee the protection of employees and others from dismissal, discrimination, harassment, or other forms of pressure for filing a complaint. Good faith complaints will be considered even if the information provided is unverified. Anonymous reports are also accepted and will be considered whenever possible.

### 7.3 Review process

Reports are registered and classified according to significance. They are forwarded to responsible managers for review, while excluding the participation of individuals with conflicts of interest.

In accordance with LRU-445, the Law of the Republic of Uzbekistan “On appeals of individuals and legal entities,” the timeframes for considering complaints are:

- up to 15 days from the date of receipt by the organization or its official, who are obliged to resolve the issue on the merits,
- up to one month in cases where additional study and/or verification is required, or a request for additional documents.
- the period may be extended for another month in cases where an inspection, the request for additional materials or the adoption of other measures is necessary to consider applications and complaints,

Following the review, measures are taken to restore violated rights and a response is sent to the complainant. Collective appeals are processed in accordance with the established procedure. All materials are stored in accordance with the requirements of the legislation of the Republic of Uzbekistan.

## 8. Roles and Responsibilities

We recognize that the successful implementation of the Human Rights Protection Policy depends on the participation of all employees, managers, relevant departments, and external partners.

All employees, contractors and other persons acting on behalf of the Company are obliged to:

- adhere to corporate values;
- make responsible decisions and fulfill their duties in good faith;
- report violations in a timely manner;
- protect confidential information;
- avoid conflicts of interest and follow established procedures for their resolution;
- comply with occupational health and safety standards in accordance with legislation and internal documents.

Managers and key specialists are required to:

- set a personal example of respect for human rights and corporate values;
- support employees and ensure equal opportunities;
- respond promptly to identified violations;
- organize and ensure the implementation of training programs.

The relevant departments ensure the systematic implementation of the Policy:

- Those responsible for the ESG agenda and compliance coordinate the implementation and monitoring of compliance with standards in the area of human rights protection and risk management;
- The Human Resources (HR) department is responsible for the processes of recruitment, training, equality and consideration of employee complaints;
- The legal department ensures compliance with the requirements of the legislation of the Republic of Uzbekistan, provides advice on labour law issues, and participates in complaints review committees.

Communication channels and external partners:

- A hotline and other reporting channels are available for employees and third parties to safely report human rights violations;
- Suppliers and contractors are required to adhere to the principles of the Policy, extend them to subcontractors, and conduct staff training on key issues, including human rights and occupational safety.

## **9. Training and awareness raising**

### **9.1 Mandatory training for employees**

We conduct introductory and annual mandatory training on our Code of Conduct and Human Rights Policy. This training covers topics such as prohibition of discrimination and harassment, equal opportunity, the rights of women and vulnerable groups, occupational safety, prevention of workplace violence, and respect for human dignity. The goal is to foster a culture of respect for human rights and ensure full compliance with Uzbek law and international standards.

### **9.2 Special modules for managers, HR, procurement**

We are implementing specialized training modules for managers, HR staff, and procurement specialists. These modules cover risk assessment and management, supplier audits, and effective engagement with vulnerable employee groups. Particular attention is paid to preventing conflicts of interest and maintaining a culture of responsibility and ethics.

### **9.3 Evaluation of training effectiveness**

We regularly evaluate the effectiveness of human rights training and awareness programs. We use internal monitoring and evaluation tools, as well as system-wide corporate governance mechanisms, including questionnaires and the engagement of independent experts in accordance with the requirements of the State Assets Management Agency of the Republic of Uzbekistan and the Company's internal documents.

## 10. Control and monitoring of execution

### 10.1 Responsible departments

The implementation of the Human Rights Policy is based on a system of distributed responsibility.

- **Group for appeals from individuals and legal entities** -coordinates the work of the ethics hotline, reviews reports of potential violations, and conducts internal investigations.
- **Compliance department** - ensures the implementation of standards of integrity and transparency in business practices.
- **Human Resources (HR) Department** – is responsible for ensuring compliance with labour rights, implementing the principles of non-discrimination and equal opportunities, as well as receiving and considering employee complaints regarding working conditions.
- **Legal Department** - ensures compliance of activities with the requirements of the legislation of the Republic of Uzbekistan and international standards, provides advice on labour law issues and participates in complaint investigations.
- **Managers and chief specialists**- bear personal responsibility for compliance with human rights and the Policy, set a personal example and are obliged to take action if violations are detected.
- **ESG Responsible** -ensures the integration of human rights issues into the sustainable development system and corporate governance.

### 10.2 Internal audit and external verification

All complaints received through the hotline and other communication channels are subject to review and investigation, adhering to the principles of objectivity and confidentiality. Regular internal audits assess compliance with the Human Rights Policy, identify gaps, and develop corrective measures. If necessary, the Company may engage independent experts or external organizations to assess the effectiveness of the human rights management system and verify its results.

### 10.3 Reporting

Internal reporting is ensured through a reporting system and regular reports on compliance with the Policy. Employees can report violations through management, HR, the legal department, compliance, or the Ethics Hotline. The company guarantees the confidentiality of reports and protects employees from any form of retaliation for reporting in good faith. Progress in protecting human rights and integrating ESG principles is disclosed in public sustainability reports, ensuring transparency for stakeholders.

## 11. Appendices

### 11.1 Related documents

- Management policy
- Rules (Code) of Business Conduct
- Non-Discrimination and Anti-Harassment Policy
- Regulations on the procedure for handling appeals from individuals and legal entities
- Law of the Republic of Uzbekistan "On Appeals of Individuals and Legal Entities" No. LRU-378 dated 03.12.2014.
- Labour Code of the Republic of Uzbekistan
- Law of the Republic of Uzbekistan "On Commercial Secrets"
- Regulation on the Unified Portal of Interactive Government Services (Resolution of the Cabinet of Ministers No. 378 of December 30, 2012)
- Regulation on the criteria for assessing the performance of joint-stock companies and other entities with a state share (Resolution of the Cabinet of Ministers No. 207 of July 28, 2015)
- Strategic vision and values of the Company
- Occupational Health and Safety Policy
- Anti-corruption and compliance Policy
- Information Policy of the Company
- Internal procurement documents