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of JSC "Navoiyazot"  
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## **NON-DISCRIMINATION AND ANTI-HARASSMENT POLICY**

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## Terms and definitions

**Hostility-** behavior aimed at creating an unfavorable, humiliating, or aggressive atmosphere in the work environment. This may include verbal abuse, hostile gestures, ignoring, humiliation, or psychological pressure on an employee or group of employees.

**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 gender, age, race, ethnicity, language, religion, political opinion, disability, marital status or other characteristic that results in a violation of equality of opportunity or treatment.

**Disciplinary measures-** consequences for employees who violate company rules or policies.

**Debt bondage-** a form of forced labor in which a person is required to work to pay off a debt, while the working conditions and terms of repayment of the debt are not defined or do not actually allow for the repayment of the debt.

**Harassment-** unwanted behavior of a sexual or non-sexual nature that creates a hostile or humiliating environment.

**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.

**Conflict of interest-** a situation in which the personal interests of an employee (financial, family, other) or his obligations outside of work may influence or create the appearance of influence on the objectivity, impartiality and effectiveness of the performance of his official duties and decision-making in the interests of the Company.

**Parochialism-** hiring, rotation, appointment of a person without taking into account the qualification requirements for the position, only by kinship (the relative popularity of a relative and his wide recognition in society) and the position of such a person's relatives in power.

**Mobbing-** systematic psychological pressure or bullying of an employee by the team or management.

**Nepotism (cronyism)-** familiarity with the use and/or influence of power for the purpose of granting illegal privileges to close relatives or friends, as well as the accrual of unjustified remuneration to close relatives and/or friends, the employment and dismissal of close relatives and friends, causing damage to corporate interests during appointments.

**Persecution or repression-** any negative actions taken against an individual who reports discrimination, harassment, or other violations. These include threats, dismissal, demotion, worsening working conditions, pressure, or other measures aimed at intimidation or punishment.

**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, withholding of documents, restrictions on freedom of movement, and threats of punishment.

**Harassment-** unwanted 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.

**Stereotyping-** the process of attributing stable, generalized characteristics (for example, based on gender, age, ethnicity, religion, social status) to a person or group of people, which can lead to bias, limited equal opportunities, and discrimination.

**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.

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## 1. Introduction

This “Navoiyazot” JSC (hereinafter referred to as the Company) Policy aims to establish principles of fair and ethical business conduct and to integrate sustainable development into all aspects of the Company's operations. It is based on international standards and applies to all employees, contractors, and third parties acting on behalf of the Company. The policy prohibits discrimination on various grounds and ensures equal opportunities for all, including gender equality and support for diversity, equality, and inclusion.

### 1.1. Objective of the policy

We reaffirm our commitment to providing a safe and respectful work environment free from discrimination, bullying, harassment, and any other forms of unacceptable behavior that may harm employees. We commit to creating conditions free from discrimination and harassment, maintaining a culture of respect, inclusion, and equal opportunity, guaranteeing protection from violence and intimidation, ensuring fair working conditions, including fair wages, equal pay for work of equal value, respect for working hours, and paid leave, and recognizing the right to freedom of association, collective bargaining, and free expression without fear of retaliation, while completely eliminating any form of forced or involuntary labor.

The policy is based on:

- Universal Declaration of Human Rights (UN)<sup>1</sup>
- 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<sup>2</sup>
- UN Guiding Principles on Business and Human Rights<sup>3</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.

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<sup>1</sup> [Universal Declaration of Human Rights \(UN\)](#)

<sup>2</sup> [ILO \(International Labour Organization\) Declaration on Fundamental Principles and Rights at Work](#)

<sup>3</sup> [UN Guiding Principles on Business and Human Rights](#)

### 1.3 Policy Commitments

We undertake to comply with international principles of non-discrimination and combating harassment. We strictly adhere to legal requirements, as well as the principles enshrined in applicable regulatory and international documents. Thus, the company does not tolerate either direct or indirect discrimination in accordance with the Principle of Equal Labour Rights and the Prohibition of Discrimination in Employment and Occupation of the Labour Code of the Republic of Uzbekistan.

The company undertakes to:

- Prohibit discrimination based on: gender, age, race, ethnicity, religion, language, social origin, disability, health status, marital status, pregnancy, military service or veteran status, property status, membership in associations, as well as any other characteristics not related to business qualities.
- Ensure equal employment opportunity: Hiring, training, promotion and compensation decisions are made only on professional criteria.
- Ensure fair payment: equal pay for work of equal value.
- Support the Diversity, Equity, Inclusion (DEI) organizational structure.
- Provide special conditions in accordance with current legislation for employees:
- Employees of pre-retirement and retirement age: Possibility of concluding fixed-term employment contracts. Guarantees provided by law to protect their rights,
- Pregnant women: Compliance with all legal requirements, including prohibiting dismissal and providing necessary benefits. Ensuring safe working conditions.
- Employees with disabilities: Creating conditions that accommodate individual needs. Providing benefits and guarantees in accordance with the law.
- Students: Possibility of agreeing on conditions for successful combination of study and work.

### 1.4. Policy Approach to Preventing Discrimination and Harassment

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 obliged to respect human rights and labor standards and prevent any violations in their activities 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. Basic Principles of Policy

### 2.1. The principle of gender equality and equal opportunities in employment

We strive to ensure equal employment opportunities and career advancement for all employees, eliminating any form of gender discrimination, in accordance with national laws and international standards. This applies to all employees, contractors, temporary workers, interns, and job candidates.

Principles of “Navoiyazot JSC Company in the Area of Gender Equality and Equal Opportunities:

All decisions regarding hiring, training, promotion, and compensation at JSC Navoiyazot are made solely on the basis of professional criteria, qualifications, business qualities, and performance.

- The Company provides equal opportunities for all without discrimination or harassment based on gender, age, race, nationality, language, social origin, property and official status, place of residence, religious affiliation, beliefs, membership in public associations, or other circumstances.
- The Company's management policy excludes manifestations of parochialism, nepotism, and favoritism, ensuring transparency and objectivity in personnel decisions.

### 2.2. The principle of fair payment

JSC “Navoiyazot” guarantees that the remuneration system complies with the labor legislation of the Republic of Uzbekistan, including regulations on working hours, overtime, wages, and compensation.

- The Company ensures equal pay for work of equal value regardless of gender and other characteristics not related to work performance.
- Each employee is provided with a payroll statement containing complete information for verifying accruals and payments.
- The internal social responsibility of an enterprise provides for the stability of wages and their compliance with a socially significant level.

### 2.3. Supporting the principle of "Diversity, Equality, Inclusion"

“Navoiyazot” JSC adheres to the principles of gender equality as a key element in building an inclusive corporate culture.

- Managers at all levels and employees are required to respect human rights in accordance with the Company's Human Rights Policy.
- The Company's corporate ethics and values are aimed at creating an environment where any form of harassment is excluded and where every employee feels respected and supported.
- As part of its internal social responsibility, the Company provides assistance to staff in critical situations and strengthens employee engagement and responsibility, creating a cohesive team of like-minded individuals.
- The Company's management and control bodies, officers and employees ensure equal treatment of all shareholders, regardless of gender, income level, race, religion, nationality, language or social origin, which confirms its commitment to a non-discriminatory approach.
- “Navoiyazot” JSC has a Women's Affairs Council, which implements initiatives and activities to promote gender equality and protect women's rights.

### 2.4. The principle of preventing harassment and mobbing

Our goal is to maintain a work environment based on the dignity of each individual and the prevention of any form of harassment. We strive to create a safe and respectful work environment, free from any form of psychological or physical pressure.

Company “Navoiyazot” JSC prohibits discriminatory, harassing, or retaliatory behavior in the workplace by any employee or other individuals. Any behavior that demonstrates hostility, disrespect, or abuse toward an individual is prohibited. Inappropriate touching, sexual innuendo, lewd jokes; insults, stereotyping, verbal and visual taunting; threats, intimidation, isolation, spreading rumors; any violence or threat of violence or other any form of abuse or harassment are prohibited.

We implement strict principles to ensure fair treatment of all employees. Below are the core principles of our policy, which we are committed to upholding:

- Zero tolerance for harassment and mobbing  
The company does not tolerate any form of harassment or offensive work environment, whether it comes from within or outside the workplace.
- Zero tolerance for violence  
“Navoiyazot” JSC does not accept child labor or any form of forced labor, including debt bondage, forced labor, or any involvement in human trafficking.
- Protection from persecution  
Prohibition of retaliatory measures against those who reported a violation in good faith. Harassment or persecution of an individual or a legal entity in connection with their appeal, or for an expressed opinion and the criticism contained in such an appeal, shall entail liability in accordance with the procedure established by law. In the event of a conflict of interest, employees must assist Company officials in analyzing the relevant information.

### **3. 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.

#### **3.1. 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 99-278-41-11),
- form on the official website and corporate email: [personal@navoiyazot.uz](mailto:personal@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.

#### **3.2. Principles of consideration**

Our policy is aimed at ensuring fair and impartial investigations of all incidents and protecting whistleblowers from any form of retaliation. We strive for transparency at every stage of the whistleblower process so that employees can be confident their voices will be heard and taken into account. The key principles of our Policy are as follows:

- Confidentiality: All reports of misconduct will be treated confidentially and subject to a full and fair investigation.
- Prohibition of Retaliation: Retaliatory measures of any kind are strictly prohibited or will not be tolerated. This includes disciplinary action, reprisals, intimidation, or any other form of

retaliation against a whistleblower who reports wrongdoing in good faith, even if the allegation cannot be substantiated.

- Transparency of stages: the review process includes the following stages: acceptance, registration, investigation, result.

### 3.3.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.

The review periods are:

- up to 48 hours for messages categorized as “immediate response”;
- up to 5 days for messages categorized as “high significance”;
- up to 15 days for requests categorized as “medium significance”.

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.

## **4. Regulation on disciplinary liability**

### **4.1. Basis for application**

Disciplinary measures are applied when an employee violates the established standards of the Non-Discrimination and Anti-Harassment Policy, as well as the provisions of the Code of Business Conduct. Basis for the application of measures may include actions or inactions that violate the principles of this Policy, obstruction of an internal investigation into a complaint, or retaliation against a complainant who reported a violation in good faith.

### **4.2. Measures**

Disciplinary measures may be applied in accordance with applicable law and include:

- remark / warning
- rebuke
- suspension from work
- termination of an employment contract.

### **4.3. Principles of application**

“Navoiyazot” JSC shall be guided by the following principles when imposing disciplinary measures:

- **Proportionality:** Disciplinary action must be proportionate to the seriousness of the offence.
- **Taking into account the circumstances and degree of the violation:** when applying disciplinary measures, all circumstances related to the violation and the employee’s behavior are taken into account
- **Compliance with Law:** All disciplinary actions must comply with applicable laws and the Company's internal regulations.

## **5. Educational materials for staff training**

### **5.1. Mandatory training for employees**

We conduct introductory and annual mandatory training on the Code of Conduct and Human Rights Policy. The training covers topics such as Gender equality and non-discrimination, prevention of harassment and mobbing, complaints procedure, liability for violations. The goal is to develop a culture of respect for human rights and ensure full compliance with the legislation of the Republic of Uzbekistan and international standards.

### **5.2. Training formats**

The main forms of training include annual training sessions for all staff, induction courses for new employees and interns, online modules with subsequent testing to reinforce knowledge, and practical exercises using case studies and role-playing situations. In addition, the Company organizes legal clarifications and roundtable discussions aimed at raising employee awareness of equality and discrimination prevention.

### **5.3. Responsibility**

Responsibility for organizing and updating training programs rests with the Deputy Head of the Personnel Training Department, who ensures timely delivery of training sessions and updating of materials. The Compliance Department oversees the completeness of content and compliance with standards. Department heads are required to ensure that all employees participate in mandatory courses and training sessions and record their completion. The results of the pass are subject to registration in the internal control system and may be taken into account when certifying employees.

## 6. Appendix

### 6.1 Related documents

- Human Rights Policy
- Anti-Corruption and Compliance Policy
- Rules (Code) of Business Conduct
- Regulations on the procedure for handling appeals from individuals and legal entities
- Management Policy