

APPROVED
JSC “Almalyk MMC”
Chairman of the Board
A. Khursanov
The 28th of January 2026

Cultural Heritage Management

Policy and Procedure

1. General Provisions

1.1. This Policy and Procedure establishes the rules for systematic identification, protection and management of cultural heritage objects by JSC “Almalyk MMC” (hereinafter – the “Complex”).

Both tangible (e.g. archaeological sites, heritage buildings) and intangible (e.g. traditional ceremonies, folk oral creativity) heritage fall within the scope of this document.

The requirements of this document apply even in cases where no cultural heritage objects have been identified in the areas of active operations.

1.2. JSC “Almalyk MMC” is committed to responsible business conduct principles that include the protection of cultural heritage in accordance with the national legislation of the Republic of Uzbekistan, Copper Mark standards, International Finance Corporation (IFC) Performance Standard 8 (PS8), and Initiative for Responsible Mining Assurance (IRMA, Chapter 3.7) requirements.

1.3. The purpose of the Policy is to minimize the risk of adverse impacts on cultural heritage, ensure compliance with national and international standards, and engage stakeholders in the management process. It also includes procedures for recording and managing unexpected finds.

1.4. The requirements of this Policy and Procedure are mandatory for all structural subdivisions of the Complex as well as for contractors working with it.

2. Scope of Application

2.1. This Policy and Procedure applies to all types of activities of the Complex in Uzbekistan, including exploration, extraction and related works.

2.2. The document covers processes for identification, protection and management of cultural heritage objects, as well as procedures to be followed in the event of unexpected finds.

3. Terms and Definitions

3.1. **Cultural heritage** – tangible objects (e.g. archaeological sites, historical buildings) and intangible attributes (e.g. traditions, ceremonies) that possess cultural, scientific, spiritual or religious significance.

3.2. **Cultural heritage of high significance** – objects of international importance or considered irreplaceable (as interpreted in IFC PS8).

3.3. **Unexpected find** – identification of tangible (ceramics, bones, structures) or intangible (sites considered sacred by local communities) cultural heritage objects during operational activities.

3.4. **Mitigation hierarchy** – an impact management approach that includes avoidance, minimization, restoration and compensation.

3.5. **Cultural Heritage Responsible Person** – an employee or team with experience in archaeology, anthropology or cultural resource management.

3.6. **Stakeholders** – local communities, Agency for Cultural Heritage of Uzbekistan, historians, non-governmental non-profit organizations and other entities affected by the Complex's activities.

4. Management Bodies and Responsible Parties

4.1. Complex Management:

- Ensures compliance of this Policy and Procedure with international standards.
- Monitors implementation and makes decisions on key issues.

4.2. All subdivisions involved in operations:

- Ensure compliance with the Policy and Procedure, including implementation of necessary measures for unexpected finds.
- Familiarize employees and contractors with this policy.
- Immediately report any cultural heritage finds to the Responsible Person.

4.3. Cultural Heritage Responsible Person:

- Coordinates identification, assessment and management of cultural heritage.
- Organizes consultations with stakeholders.
- Conducts monitoring and prepares reports on management measures.
- Ensures compliance with national legislation and international standards.

4.4. Site Managers:

- Immediately stop work upon discovery of a find.
- Immediately notify the Responsible Person.

4.5. Employees and Contractors:

- Identify and report potential finds.

- Comply with procedures taught during training sessions.

5. Commitments of the Complex

5.1. Identification and protection: Actively identify and protect tangible and intangible cultural heritage within the areas of the Complex's activities.

5.2. Compliance with legislation: Compliance with the following laws of the Republic of Uzbekistan:

- Article 61 of the Constitution of the Republic of Uzbekistan (as amended on May 1, 2023).
- Law of the Republic of Uzbekistan No. 269-II dated August 30, 2001 "On Protection and Use of Cultural Heritage Objects".
- Law of the Republic of Uzbekistan No. O'RQ-229 dated September 17, 2009 "On Protection and Use of Archaeological Heritage Objects".
- Law of the Republic of Uzbekistan No. 678-I dated August 29, 1998 "On Export and Import of Cultural Property".
- Resolution of the Cabinet of Ministers No. 846 dated October 4, 2019 "On Approval of the National List of Immovable Objects of Tangible Cultural Heritage".

5.3. Compliance with international standards: UNESCO conventions (1972 Convention Concerning the Protection of the World Cultural and Natural Heritage), IFC PS8 and IRMA Chapter 3.7.

5.4. Stakeholder engagement: Meetings and discussions with local communities, culture authorities and other stakeholders; obtaining Free, Prior and Informed Consent (FPIC) from indigenous peoples where required.

5.5. Application of the mitigation hierarchy: avoidance, minimization, restoration and compensation measures.

5.6. Procedure for unexpected finds: implementation in accordance with national legislation.

5.7. Training and awareness: Training for employees and contractors on identification and reporting of potential finds.

5.8. Transparency and reporting: Publication of cultural heritage management results in the annual sustainability report in accordance with GRI requirements, conducting independent audits.

6. Cultural Heritage Management Process

Step 1. Immediate cessation of work: Upon discovery of a find, work is stopped immediately and the site manager is notified.

Step 2. Notification: The site manager immediately provides the Responsible Person with information about the location, description, photos, date and time of the find. The Responsible Person notifies the Agency for Cultural Heritage within 48 hours in accordance with Law No. O'RQ-229 dated September 17, 2009.

Step 3. Site protection: A 50-meter safety perimeter is established; work does not resume until permission is obtained.

Step 4. Assessment of the find: Within 7 days, a qualified specialist is engaged to determine the type, significance and degree of impact of the find.

Step 5. Consultation with stakeholders: If the find is significant, meetings and discussions are held with local communities, the Agency and other parties in accordance with FPIC requirements.

Step 6. Impact mitigation

Based on assessment results, consultations and discussions, measures are developed: rerouting, impact reduction, object restoration, funding of cultural projects.

Step 7. Implementation and monitoring: Measures are implemented immediately; monthly monitoring is conducted.

Step 8. Documentation and reporting: Assessment results, consultation records, measures and monitoring results are included in reports, submitted to the Agency and added to the annual report.

Step 9. Grievance handling: Complaints are reviewed within 30 days.

Step 10. Training: Training is updated based on the find and conducted with participation of relevant organizations.

7. Grievance Mechanism

Possibility of anonymous submission and submission in Uzbek language.

Complaints are reviewed within 30 days.

Contact channels:

- Website: <https://agmk.uz/ru/virtual>
- Email: info@agmk.uz
- Telephone: +99870 619-23-33; +99870 619-51-16

8. Tools and Resources

- Unexpected Find Report Form (Appendix 1).
- Mitigation Measures Plan (Appendix 2).
- Monitoring logs and photographs.
- Open sources: Agency for Cultural Heritage and UNESCO registries.

9. Monitoring and Reporting

The Policy and Procedure may be reviewed annually or upon occurrence of a find.

Results are published on the Complex's website.

Documents are retained for 5 years.

10. Compliance and Sanctions

Non-compliance with the Policy leads to disciplinary measures for employees and sanctions for contractors.

Information on finds is verified and cooperation with state authorities is carried out.

11. Final Provisions

This document enters into force on the date of approval and is reviewed annually.

All subdivisions and contractors must ensure compliance with Copper Mark, IFC PS8 and IRMA standards.

Familiarization with the document is confirmed by signature.

Appendix 1
to the Cultural Heritage Management
Policy and Procedure
of JSC “Almalyk MMC”

Unexpected Find Report

- Date of discovery: _____
- Location of find: _____ (GPS coordinates if available)
- Description of find: _____ (type, size, condition)
- Photographs: Attached Not attached
- Notification to Cultural Heritage Responsible Person: Done Not done
- Notification to Agency for Cultural Heritage: Done Not done

Responsible employee: _____ (Full name, position)

Signature: _____

Date: _____

Appendix 2
to the Cultural Heritage Management
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Mitigation Measures Plan

No	Description of find	Measure (Avoidance / Minimization / Restoration / Compensation)	Implementation deadline	Responsible person	Status
1					
2					
3					
...					

Signature of Responsible Person: _____

Position: Cultural Heritage Responsible Person, JSC “Almalyk MMC”