

Geneva, 26 August 2026

Mr. Jürgen Pilarsky
Chief Executive Officer

CRONIMET Holding GmbH
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To: pilarsky.jurgen@cronimet.de;
Cc: Ms. Annette Gartner, Managing Director (sustainability): public-relations@cronimet.de;
mail@cronimet-mining.com
Cc: Eduard Pahlevanyan, Chairman, Branch Union of Trade Union Organizations of Miners,
Metallurgists and Jewellers of the Republic of Armenia;
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IndustriALL Global Union calls on CRONIMET to restore trade union rights at "Pure Iron Plant" OJSC in Armenia

Dear Mr. Pilarsky,

I am writing to you on behalf of IndustriALL Global Union, which has 550 affiliates in 130 countries, including Armenia, representing over 50 million workers in the mining, energy and manufacturing sectors.

Our Armenian affiliate, the Branch Union of Trade Union Organizations of Miners, Metallurgists and Jewellers of the Republic of Armenia, has formally brought to our attention a serious and unresolved situation concerning freedom of association at "Pure Iron Plant" OJSC in Armenia, an operation within the CRONIMET group.

According to our affiliate, the management of the plant obstructed the activities of the workplace trade union organization. Specifically, the head of the trade union organization was restricted in accessing and leaving the factory premises, and pressure was exerted on union members with the aim of compelling them to resign their membership.

The trade union was left with no option but to litigate. Following a judicial process lasting three years, it prevailed at two levels of the Armenian courts. Despite these rulings, our affiliate reports that the union's ability to operate freely and normally on the factory premises has still not been restored in practice. This is our central concern: a company within your group is, on our affiliate's account, not giving full effect to binding decisions of the courts of the country in which it operates.

The context makes this more significant, not less. Before these difficulties arose, the plant employed some 400–500 workers, of whom approximately 80 per cent were trade union members. This is a highly representative organization, not a marginal one, and the situation therefore affects the great majority of the workforce.

The situation raises serious concerns under internationally recognized standards on freedom of association and collective bargaining, including ILO Conventions No. 87 and No. 98, both ratified by Armenia, as well as ILO Convention No. 135 concerning the protection and facilities to be afforded to workers' representatives, also ratified by Armenia.

The situation is also relevant under the OECD Guidelines for Multinational Enterprises on Responsible Business Conduct, which recognize freedom of association and collective bargaining and set out expectations for enterprises to conduct risk-based due diligence to identify, prevent and mitigate adverse impacts and, where appropriate, provide for or cooperate in their remediation.

These concerns are particularly relevant in light of CRONIMET's own public commitments. In its Sustainability Report 2023, CRONIMET states that it respects internationally recognized human rights and expressly aligns its business activities with the UN Guiding Principles on Business and Human Rights, the ILO Core Labour Standards and the ILO Declaration on Fundamental Principles and Rights at Work. CRONIMET further recognizes its responsibility to take corrective measures and contribute to remediation in relation to actual or potential negative impacts caused by its operations.

CRONIMET has also publicly committed to implementing voluntarily the main elements of the German Supply Chain Due Diligence Act (Lieferkettensorgfaltspflichtengesetz, LkSG). Its Sustainability Report describes the corresponding human rights due diligence architecture, including risk analysis, preventive and remedial measures, internal responsibilities and mechanisms for addressing human rights risks and violations.

This is directly relevant to the present case. CRONIMET's Sustainability Report identifies Plant of Pure Iron OJSC within the CRONIMET group, while CRONIMET's human rights framework provides for due diligence and corrective action in relation to adverse human rights impacts connected with its operations. Against this background, the reported interference with freedom of association at Pure Iron Plant warrants assessment and action at CRONIMET Holding level through the group's own human rights due diligence and remediation processes.

We are writing to you, rather than escalating, because we believe this is capable of resolution through dialogue. We therefore request that CRONIMET Holding GmbH:

1. take the necessary steps at group level to ensure that the Armenian court decisions are given full practical effect, and that the trade union organization can operate freely on the premises and carry out its legitimate trade union activities without obstruction;
2. ensure that no pressure, obstruction or discrimination is exercised against the elected trade union leadership or against union members;
3. ensure the resumption of genuine social dialogue and good-faith negotiation between the plant management and the trade union;
4. address the situation through CRONIMET's human rights due diligence processes, including by assessing the reported adverse impacts on freedom of association and taking appropriate corrective and remedial measures, consistent with the human rights due diligence framework and commitments CRONIMET has publicly established; and

5. inform us of the measures taken or planned by CRONIMET at group level to resolve the situation and prevent similar interference with trade union rights from recurring.

We would welcome a meeting, in person in Karlsruhe or online, with your representatives and those of our affiliate, at your earliest convenience. We would be grateful for a response by 15 September 2026.

IndustriALL Global Union approaches this in a spirit of constructive engagement, and we are ready to assist in facilitating a solution. We trust that CRONIMET will address this matter consistently with its own publicly stated human rights commitments and with internationally recognized standards on freedom of association and collective bargaining.

Yours sincerely,



Atle Høie
General secretary