

Geneva, 26 August 2026

Mr. Hmayak Yezekyan
Executive Director

Mr. Armen Chatyan
Commercial Director

Pure Iron Plant OJSC,
75 Artsakhi Avenue, 0053 Yerevan, Republic of Armenia

Cc: Mr. Jürgen Pilarsky, CEO, CRONIMET Holding GmbH : pilarsky.jurgen@cronimet.de;
pureiron@netsys.am; Info@pureironplant.am; pureiron@netsys.am;

Cc: Eduard Pahlevanyan, Chairman, Branch Union of Trade Union Organizations of Miners, Metallurgists and Jewellers of the Republic of Armenia: tummjra@mail.ru;

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IndustriALL Global Union Calls on Pure Iron Plant OJSC to restore trade union rights and implement court decisions

Dear Mr. Yezekan, dear Mr. Chatyan,

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. The Branch Union of Trade Union Organizations of Miners, Metallurgists and Jewelers of the Republic of Armenia is our affiliate, and the trade union organization at your enterprise is part of that structure.

Our affiliate has informed us that the trade union organization at "Pure Iron Plant" has faced obstruction of its lawful activities, including restrictions on the access of its elected head to the enterprise premises, and pressure on members intended to induce them to leave the union. We are further informed that after three years of litigation the trade union obtained favourable decisions at two levels of the Armenian court system, and that these decisions have nonetheless not been fully implemented in practice. We do not write to reopen matters already considered by the Armenian courts. Our immediate concern is that, according to the information provided to us, the trade union's ability to exercise its legitimate functions has still not been fully restored in practice despite those judicial decisions.

This situation raises serious concerns under Armenian labour law. Article 26 of the Labour Code of the Republic of Armenia expressly requires employers to respect the rights of workers' representatives, not to impede their activities, and to ensure the exercise of the rights of workers' representatives provided for by law. The same provision requires employers to ensure the conduct of collective bargaining within short time limits. Article 25 further recognizes the right of workers' representatives to conduct collective bargaining, supervise the implementation of collective agreements and exercise non-state supervision over the implementation of labour legislation within the enterprise.

These protections are reinforced by Armenia's international obligations. Armenia has ratified ILO Conventions No. 87 on Freedom of Association and Protection of the Right to Organize, No. 98 on the Right to Organize and Collective Bargaining, and No. 135 on Workers' Representatives, all of which are in force for Armenia. The conduct reported to us, in particular alleged interference with the activities of an elected trade union representative and pressure on workers to relinquish their union membership, therefore raises serious concerns regarding freedom of association and the effective protection of workers' representatives.

We therefore call on the management of "Pure Iron Plant" OJSC to:

- give full and effective implementation to the decisions of the Armenian courts without further delay, including by removing any remaining obstacles preventing the trade union and its elected leadership from carrying out their legitimate functions;
- ensure that the elected trade union leadership is able to exercise its legitimate representative functions at the enterprise without obstruction, in accordance with Armenian law and the relevant court decisions;
- refrain from any act of interference, pressure or discrimination against trade union representatives or members on grounds of their union membership or activity;
- restore regular and good-faith social dialogue with the trade union organization and ensure that collective bargaining can take place without interference;
- provide written confirmation of the concrete measures taken to give full practical effect to the court decisions and restore the effective exercise of trade union rights at the enterprise.

We have raised this matter simultaneously with CRONIMET Holding GmbH in Karlsruhe. CRONIMET publicly states that it respects internationally recognized human rights and 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 has also publicly committed to voluntarily implementing the main elements of the German Supply Chain Due Diligence Act (Lieferkettensorgfaltspflichtengesetz, LkSG) through its human rights due diligence processes.

CRONIMET's own Sustainability Report specifically addresses freedom of association and collective bargaining and recognizes the reputational and financial risks associated with these rights in the context of supply chain due diligence. The situation reported at Pure Iron Plant therefore engages not only the obligations of the enterprise under Armenian law and the relevant court decisions, but also the human rights due diligence processes and public commitments established at CRONIMET group level.

We would be glad to see this matter closed constructively and locally. We have written in parallel to CRONIMET Holding GmbH in Karlsruhe, and we would welcome a joint meeting involving the trade union, the enterprise and the group.

We request a written response by 15 September 2026 setting out the measures taken or planned to resolve these issues.

Yours sincerely,



Atle Høie
General secretary