

EVRAZ

Supplier Code of Conduct

For a Better Future

Contents

- Introduction 4
- Health and safety 5
- Environmental performance 6
- Human rights and working conditions..... 7
- Ethical business practices..... 8
- Emergency preparedness 9
- Implementation of the Code 10
- Governance and reporting principles 11
- Review 12
- Reference materials..... 13

Introduction

As one of the world's leading steel and mining companies, EVRAZ plc and its affiliates (collectively, "EVRAZ" or "the Group") recognise that their activities may impact a wide range of stakeholders and communities. EVRAZ therefore sets high health and safety, environmental, social and ethical standards for its suppliers to provide for a sustainable supply chain.

The EVRAZ Supplier Code of Conduct ("the Code") informs suppliers of the Group's expectations when conducting business with EVRAZ. The Code, along with the Group's other policies, outlines EVRAZ' belief that following internationally recognised principles of just and honest behaviour and cooperation is fundamental to a successful business.

This Code applies to EVRAZ' relationships with suppliers of goods and services, subcontractors, business partners and other stakeholders, who currently or seek to engage in business relations with the Group. EVRAZ expects all of its suppliers to comply with the requirements set out in this Code and replicate them through the use of sustainable procurement policies for their own suppliers further up the supply chain. The Group makes this Code available to its suppliers and encourages them to play their part in building a fair and sustainable global economy.



Health and safety

Safeguarding the health and safety of people and thereby providing for a favourable living environment for future generations is one of EVRAZ' priorities.

The Group expects its suppliers at all times to:

- Comply with all applicable international and national laws and regulations
- Observe best practices to ensure the health and safety of their employees
- Provide working conditions that correspond to the highest standards of health and industrial safety, including the provision of personal protective equipment and access to first aid
- Ensure that goods, equipment and personnel are transported safely
- Promote activities which assist them in adopting responsible business procedures, raising awareness through training and helping personnel to apply safe working practices
- Develop their own appropriate policies or standards with zero harm targets that ensure the health and safety of their employees, or fully comply with the EVRAZ health and safety standards set out in this Code, the HSE Policy and the Code of Business Conduct
- Implement robust emergency preparedness procedures to identify and assess potential emergency situations
- Implement incident reporting and investigation procedures

Environmental performance

A proactive approach towards environmental protection is a core element of EVRAZ' corporate strategy.

The Group expects its suppliers at all times to:

- Comply with all applicable international and national laws and regulations in the field of environmental legislation and applying to activities such as production, transportation, processing and waste disposal
- Obtain necessary permits and observe reporting requirements
- Ensure that they identify the environmental impact of their operations, products and services
- Take all required precautions aimed at protecting the environment and undertake measures to minimise any negative environmental impact
- Develop and operate control systems aimed at monitoring environmental indicators, as well as mitigating and remediating any damage caused to the environment
- Strive to reduce greenhouse gas and other air emissions from their operations
- Pursue energy efficiency by minimising energy losses and using renewable energy resources
- Adopt responsible approaches to water consumption and discharge
- Protect biodiversity and foster a proper attitude towards nature and biodiversity, especially towards protected areas
- Handle and dispose of chemicals, hazardous materials and waste according to all applicable safety requirements and in a manner that prevents any negative impact on nature and people
- Strive to use electronic document flows to reduce pollution, protect forests and conserve biodiversity

Human rights and working conditions

EVRAZ is committed to creating favourable working conditions and safeguarding employee rights. EVRAZ adheres to the principles of equality and non-discrimination.

The Group expects its suppliers at all times to:

- Strictly observe all internationally recognised human rights and freedoms
- Treat all people with dignity, guaranteeing the prohibition of inhumane treatment and abuse, and ensuring that their employees have equal opportunities and conditions based on the individual's abilities and merit
- Ensure that employment is freely chosen
- Prohibit any discrimination by gender, gender identity or expression, age, nationality, race, ethnicity, skin colour or cultural background, religion or belief, disability, genetics or health information including pregnancy, sexual orientation or union affiliation
- Demonstrate zero tolerance to any form of child labour, bonded labour, human trafficking and any other forms of slavery (known as "modern slavery")
- Provide employees adequate time off in accordance with applicable laws and collective bargaining agreements, if applicable, including overtime working hours, as well as annual, sick and parental leave and any other applicable leave regulations
- Provide fair compensation and benefits
- If housing is provided to their employees, ensure that it meets the requirements of safety, sanitary conditions, optimal comfort, as well as the right to privacy



Ethical business practices

EVRAZ acts ethically and requires all suppliers to conduct business within the same ethical framework.

The Group expects its suppliers at all times to:

- Ensure full compliance with all applicable laws and regulations
- Conduct their business in accordance with the highest ethical standards and have controls in place that prohibit and detect the misuse of company assets, corruption, bribery, money laundering, tax evasion, improper gifts, extortion and conflicts of interest
- Adopt an attitude of zero tolerance towards corruption and bribery
- Act fairly, legally and honestly in line with fair competition and in accordance with all applicable antitrust and competition laws
- Respect all intellectual property rights of EVRAZ
- Treat any and all confidential information concerning EVRAZ' business activities, contracts, structure and financial performance as the property of EVRAZ and keep it confidential (except in cases of authorised disclosure of such information)
- Safeguard and prevent the misuse of information in accordance with all applicable data privacy laws when collecting, storing, using, processing or sharing personal information
- Carry out their activities in accordance with the principles of good business practice
- Strive to use existing and emerging digital technologies, including e-trading platforms and e-signatures, to tackle unfair business practices
- Demonstrate respect and integrity in relationships with EVRAZ' employees and business partners
- Provide a means for their employees to report concerns or potentially unlawful activities in the workplace, treat such reports as confidential and investigate such reports, including taking corrective action where necessary

Emergency preparedness

Emergency preparedness and response is essential for preserving the health and safety of employees and communities.

To ensure the highest levels of safety in an emergency, be it a pandemic, natural or technological disaster, or any other circumstances, every company, including EVRAZ and its suppliers, must react in a timely manner and take adequate preventive or mitigating measures. In this regard, the Group expects its suppliers to:

- Develop appropriate action plans covering necessary measures aimed at fully eliminating or, where impossible, mitigating any negative impact on the health of employees, temporary workers, members of local communities, other stakeholders and the environment
- Provide personal protective equipment for employees who must be present at work or who are directly involved in responding to emergencies
- Conduct regular technical checks and tests to ensure that all equipment is in proper and safe working condition
- Regularly train their employees in how to respond to emergencies



Implementation of the Code

EVRAZ acts ethically and requires all suppliers to conduct business within the same ethical framework.

Having adopted this Code, EVRAZ recognises its responsibility to ensure that its suppliers are familiar with the provisions of the Code.

The Group will engage with all of its suppliers in order to understand the steps that they have taken in complying with the requirements set out in this Code. The forms of engagement include questionnaires, interviews and the development of awareness related materials. Where deemed appropriate for the purpose of ensuring compliance with the Code, EVRAZ conducts due diligence on its suppliers, or asks its suppliers to do so in relation to their subcontractors,

and analyses the activity of a supplier or contractor (including its experience, qualifications, reputation and adherence to the expectations set out in this Code).

EVRAZ assesses its suppliers in their approaches to conducting fair and transparent business and this particular aspect comprises an important component of EVRAZ' supplier selection process. In this respect, EVRAZ organises field inspections and supplier audits, checks the financial standing of a supplier and assesses feedback.



Governance and reporting principles

EVRAZ welcomes feedback from all of its stakeholders. Anyone can report concerns about any form of non-compliance with this Code by EVRAZ or a supplier and address questions and comments through confidential 24-hour hotlines:

- The Corporate whistleblowing line in Russia and Kazakhstan:

email: vopros@evraz.com
toll-free number: 8-800-555-88-88 (Russia),
8-800-080-43-58 (Kazakhstan)
internal corporate portal: <https://portal.evraz.com/hotline/SitePages/Hotline.aspx>

- The EVRAZ North America whistleblowing line:

email: hotline@evraz.com
toll-free number: 866-334-1777
internal corporate portal: <https://secure.ethicspoint.com/domain/media/en/gui/56482/index.html>

The Group commits to responding appropriately and promptly in response to all issues raised and will protect those who raise concerns in good faith, even if they turn out to be mistaken.

Review

This Code will be regularly reviewed by EVRAZ' senior executives on a regular basis and, if needed, may be amended at any time to reflect business developments or changes to international or national laws and regulations.



Reference materials

This Supplier Code of Conduct should be considered in conjunction with the Group's policies listed below, which are available on the EVRAZ website <https://www.evraz.com/en/>:

- Code of Business Conduct
- Human Rights Policy
- Diversity and Inclusion Policy
- Anti-Corruption Policy

This Code has been developed in accordance with the following international documents and standards:

- Universal Declaration of Human Rights
- International Labour Organisation Core Labour Standards
- International Labour Organisation Declaration on Fundamental Principles and Rights at Work
- United Nations Guiding Principles on Business and Human Rights
- United Nations Global Compact
- International Council on Mining and Metals: Framework for Sustainable Development
- Voluntary Principles on Security and Human Rights