

## General information regarding the Policies governing the anti-corruption efforts of the Company

Aside from the published Policies and Regulations (the Anti-Corruption Policy, the Code of Business Conduct, the Hot Line Operation Policy, etc.), EvrazHolding (hereinafter “the Company”) has drafted and implemented other documents to govern its anti-corruption efforts. A brief summary of some of them follows.

### Government Relations Policy

This internal regulation stipulates that the coordination with the Government bodies on behalf and for the benefit of the Company be performed by the employees strictly in accordance with the list of positions, determined in the annex to the Policy. Such coordination is only permitted within the scope of employment functions and in accordance with the job description. Each of the Group entities drafts the list of such positions independently.

Should the need arise for any new unit or employee of the Company to communicate with Government bodies on a regular basis, a respective amendment is to be made to the terms of reference of the respective business unit or the job description of the employee.

This Policy does not apply to representation of the Company in court or coordination with Government bodies during audits of business and financial activity of the Company by the authorized Government body. Such relations are duly governed by separate internal policies and procedures of the Company.

Routine monitoring of the coordination with Government bodies is performed in order to ensure compliance with the applicable laws and the effective anti-corruption policies and procedures of the Company.

Said monitoring may include, among other things:

- submitting by the employee of a report and relevant documentation on the status of coordination with Government bodies (in writing) and its subsequent review by the compliance manager;
- a ban by the head of function (including upon the recommendation of the compliance manager) for the employee to carry out certain categories of actions without prior approval.

In the event of a violation of the ethical business practices or the provisions of the Anti-Corruption Policy of the Company, any employee of the Company aware of such violation shall immediately notify the Compliance manager, his/her superior, as well as other involved officers of the Company.

Should any violations be revealed, the Company conducts an internal investigation to identify those responsible and, if there is evidence of their fault, to hold them accountable in the manner prescribed by the Company.

### Candidates for Employment Background Check Policy

The purpose of the Policy is to:

- enter into employment relations with individuals capable of performing their official duties in good faith and in compliance with the laws of the Russian Federation and the internal regulations of the Company;
- verify the information provided by the candidates about themselves, their professional, investment and other activities, family and business relations with other individuals, including public officials and legal entities;
- avoid entering into employment relations with candidates inclined to commit corrupt and/or other fraudulent acts, as well as those demonstrating personality and/or lifestyles that could produce a negative effect on the good standing of the Company.

Candidate Background Check is held for the benefit of the Company acting as the employer in accordance with the effective laws of the Russian Federation, as well as the internal regulations of the Company governing the selection and recruitment process of new employees, and shall be impartial and comprehensive.

The Background Check addresses professional, business, and personal qualities of the Candidate for compliance with the vacancy/position requirements; references from previous employment are requested and reviewed. Background Check makes sure there is (1) no record of outstanding convictions, administrative, criminal, disciplinary, or other penalties, (2) no prohibition to hold management positions, (3) no adverse or compromising information about the Candidate or his/her family, (4) no signs of affiliation to Public Officials. Risks of conflict of interest are also considered comprehensively.

### Contractor Due Diligence Policy

This Policy establishes the key principles, conditions, terms, procedure, responsibility, methods, and periods of due diligence of legal entities and individuals that seek to be in contractual relations (other than employment ones) with the Company.

Validation of reliability, good standing, and anti-corruption practices of the prospective and existing contractors is executed for the purposes of due diligence on behalf of the Company. Such validation is necessary to ensure security of transactions and to mitigate risks of corruption.

Entering into contracts or arranging transactions with a contractor subject to due diligence is prohibited unless such due diligence is complete and its results do not prevent dealing with such a contractor.

The main areas of the Due Diligence are:

- review of documents of title and the powers of the contractor's representatives and signatories;
- review of relationship history with the contractor;
- verification of reliability and good standing of the contractor, including any information related to corrupt, fraudulent, and other illegal activities;
- verification of affiliation of the contractor with state authorities and/or public officials;

- detection of conflict of interest between the employees of the Company and shareholders, management, or other decision-makers from the contractor's side.

### Conflict of Interest Policy

To ensure the balance of the Company's business objectives and individual interests of its employees, the Company has a special procedure in place to disclose and mitigate conflict of interest.

A conflict of interest shall mean a situation or circumstances where the private interests of an employee and/or their family come or may come into conflict with the legitimate interests of the Company. Under such circumstances an employee or his/her family member gets personally interested in the situation which affects or could affect proper execution of their duties, including fair judgment. The private interests shall mean any personal, social, property, financial, political, and other commercial or non-commercial interests. Family shall mean the spouse, parents, children, brothers and sisters, grandfathers and grandmothers, grandchildren.

Employees have a right to be involved in legal financial, entrepreneurial, political, and other commercial and non-commercial activities in their leisure time, unless such interests and activities affect their capacity to perform their official duties with the Company.

The Company distinguishes two types of conflict of interest:

- actual (direct) conflict of interest - the private interests of an employee conflict either expressly or by implication with the business interests of the Company and/or any of its assets;
- potential conflict of interest - the private interests of an employee may under certain circumstances come into conflict with the business interests of the Company and/or any of its assets.

The employees of the Company and its assets shall be guided by the principles of fairness and good faith while performing their official duties and shall avoid any situation that could lead to a conflict of interest, including:

- in business decision-making shall be guided by the interests of the Company and/or its assets;
- shall not use their official position for personal advantage;
- shall avoid financial and other liabilities that can lead to a conflict of interest;
- shall not hold any management and/or other position related to decision-making, or be a member of the Board or other bodies, nor have any vested interest (including investments) in a competitor company, nor in the financial results of such companies;
- shall not hold any management and/or other position related to decision-making, or be a member of the Board or other bodies in any contractor of the Company or its assets other than members of EVRAZ Group or a joint venture;
- shall disclose information related to their private interests that may lead to a conflict of interest with the business interests of the Company and/or a potential conflict of interest, etc.

Should a conflict of interest arise (actual) or be likely to arise (potential), the employees of the Company and its assets shall inform the corresponding compliance manager.

The Policy defines principles, measures, and forms of resolving identified conflicts of interest that do not contradict the law, and indicates the importance of measures to prevent such situations. The document provides examples of typical conflict of interest situations and offers ways to resolve them.

The Policy informs employees about the need to declare conflict of interest, including within the framework of the annual procedure to complete the respective survey electronically at the invitation of the Company's compliance manager.

### **Corporate training of employees on the main provisions of anti-corruption policies (instruction)**

The purpose of corporate training of the Company's employees on anti-corruption issues is to:

- form an appropriate level of anti-corruption corporate culture of the Company and build an effective anti-corruption system;
- inform employees about the requirements of the applicable anti-corruption legislation and internal documents of the Company, including the EVRAZ Anti-Corruption Policy, about the anti-corruption procedures existing in the Company;
- advise the employees about the procedure for responding to detected corruption events and aspirations, both within the Company and on the part of its counterparties;
- prevent corruption.

Responsibility for development and, if necessary, updating of the program, as well as for choosing the form of corporate training for employees is assigned to the compliance manager of the Company.

The instruction defines the main categories of personnel to undertake the training. The actual decision to assign an employee for training is made by the compliance manager of the respective entity. All new employees of corresponding categories are assigned to training after successful completion of probation after information regarding employment and transfer is provided by HR.

The instruction defines the forms of corporate anti-corruption training (e-learning, face-to-face, meetings with responsible officials), and provides a basic list of questions or issues that are covered during the course of training. An e-learning course is considered completed only upon achievement of the result specified in the letter of invitation.

The Company aims to develop its own curricula and considers its own knowledge management system as a priority way to assign courses and collect information about their completion.

