

Charitable Donation and Sponsorship Policy

EVRAZ believes that the implementation of social and charitable programs and projects in the regions where it operates has a positive impact on people's living environment and contributes to favourable changes in people's lives, helping to create a better future.

1. Policy objectives

1.1 This Charitable Donation and Sponsorship Policy (hereinafter the "**Policy**") establishes the general principles and requirements that EVRAZ companies should be guided by when making a charitable donation or sponsorship contribution. Entities within the EVRAZ group should also refer to their own local Charitable Donation and Sponsorship Policy to ensure that their contributions comply with such policies and applicable laws.

2. Our giving

2.1 EVRAZ companies direct their charitable efforts primarily towards the following areas of interest:

- social support and protection of underprivileged individuals, as well as assistance to social institutions;
- support for education, culture and sport;
- healthcare support;
- support of socially significant events, social programmes and projects.

2.2 EVRAZ companies should make a distinction between charitable donation and sponsorship contribution:

- a charitable donation entails a voluntary contribution of certain value to support non-profit objectives without seeking any benefits in exchange;
- a sponsorship contribution is associated with pursuing business interests and/or achieving goals of EVRAZ companies through supporting an event, activity or organisation financially or through the provision of products or services.

2.3 Charitable donations and sponsorship contributions are the preferred forms of support.

2.4 EVRAZ companies normally provide sponsorship contributions without the involvement of intermediaries. Charitable donations are provided through charitable foundations (preferably established by EVRAZ if it does not contradict applicable law) or directly to the ultimate beneficiary.

3. Contributions policy

3.1 Eligible ultimate beneficiaries of contributions granted by EVRAZ companies are non-profit charitable organisations, individuals and legal entities, provided it does not contradict applicable local law.

3.2 EVRAZ companies can only make charitable donations where:

- the donation is made in compliance with applicable laws, as well as the principles and requirements of this Policy, the Code of Conduct and the internal regulations of EVRAZ companies;
- the donation is meant to achieve social purposes;
- the donation is not meant to secure an improper business advantage; and
- there is a valid charitable purpose for the donation.

3.3 EVRAZ companies can only make sponsorship where:

- the contribution is made in compliance with applicable laws, as well as the principles and requirements of this Policy, the Code of Conduct and the internal regulations of EVRAZ companies;
- the contribution is directly or indirectly associated with pursuing business interests and/or achieving statutory goals of EVRAZ companies; and
- the contribution is not meant to secure an improper business advantage.

4. Limitations

4.1 EVRAZ companies do not make charitable donations and sponsorship contributions if the recipients of such contributions, including ultimate beneficiaries, are any of the following (more restrictions may apply in specific countries where EVRAZ conducts business):

- serving public officials;
- government authorities;
- political parties, movements and political players or their representatives;
- military organisations and projects;
- organisations that discriminate by race, gender, ethnicity, sexual orientation, disability, marital status, age or any other basis prohibited by law;
- organisations whose policies or activities are not in line with EVRAZ values.

5. Planning of charitable and sponsorship activities

5.1 During the review and approval of the consolidated budget for the following calendar year, EVRAZ plc's Board of Directors determine and approve the annual contribution limits that EVRAZ companies may grant.

5.2 EVRAZ companies shall carry out planned charitable and sponsorship activities, as well as one-time contributions, within the approved annual limits.

6. Accounting and recordkeeping

6.1 EVRAZ companies must record all transactions and payments related to charitable donations and sponsorship contributions in a special register.

6.2 EVRAZ companies must accurately record all granted contributions in their accounts.

6.3 EVRAZ companies must monitor the proper use of funds provided for charity and sponsorship purposes.

6.4 EVRAZ companies shall ensure that sufficient information about charitable and sponsorship activities is publically available by:

- posting such information on EVRAZ' official website;
- disclosing such information in annual reports; and
- publishing such information in the media and/or other outlets.

6.5 EVRAZ companies must file all requests for charitable donations and sponsorship contributions, the results of inspections, signed agreements as well as other related documents in accordance with the procedure and within the period prescribed by EVRAZ' internal regulations and applicable law.

7. Review

7.1 EVRAZ' senior executives will review this Policy regularly and, if needed, may amend it at any time to reflect business developments or changes to international or national laws and regulations.