

DIVERSITY AND INCLUSION POLICY

of EVRAZ plc

as adopted by the Board of Directors on 16 April 2020

EVRAZ plc and its affiliates (collectively, "EVRAZ", "the Group", "the Company") is a large metals and mining business with production facilities in the Russian Federation, the USA, Canada, the Czech Republic and Kazakhstan. As one of the main employers in the regions where we operate, the Group greatly values people and endeavours to create a working environment where our employees, business partners, local communities and other stakeholders can fully realise their potential.

Scope


The EVRAZ Diversity and Inclusion Policy (hereinafter – "the Policy") will be applied to our relationship with all relevant stakeholders including all directors, officers and employees of the Group; as well as business partners and local communities. No one in EVRAZ will be exempted from the duty to comply with this Policy. Where the laws and regulations of the countries in which we operate differ from our Policy, we will apply any higher standard in place as we seek to respect diversity of all people.

Purpose and Commitment

The purpose of the Policy is to outline our commitment to recognise the benefit of diversity and inclusion to the Group. We will ensure the equal protection of all employees' rights, irrespective of their race, nationality, gender, age, sexual orientation, religion, political or other opinion, national or social origin, property, birth or other status. This Policy has been developed in accordance with international guidelines and standards, which address diversity and inclusion issues. These documents include The Universal Declaration of Human Rights, The Universal Declaration on Cultural Diversity, The United Nations Global Compact and others.

Core principles

We recognise that people are fundamental to the Group's achievements and, and the Group, strongly endorses human capital development. Our employees drive the sustainable long-term performance of the business. Diversity brings different ideas and approaches to the business, and inclusion brings them together.

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In addition to this Policy, the Group has other policies in place, which also support our commitment to diversity and inclusion. These include: our Business Conduct Policy which establishes a culture of non-discrimination by impartial assessment of employees based on their professional skills, as well as strong prohibition of any forms of modern slavery; at any EVRAZ business or their suppliers; and our Human Rights Policy which guarantees protection and respect for human rights and freedoms for all our employees, business partners, local communities and other stakeholders. Moreover, we make no distinction when giving our employees or local communities opportunities to improve their skills and overall well-being. In line with our Social Investments Guidelines, assistance to local programmes is provided through local charitable foundations established by the Company and managed by independent Supervisory Boards. Our main priority areas for investment are the following:

- Youth: initiatives which assist in the development of young people.
- Education: enabling individuals of all ages to gain new knowledge, abilities and skills.
- Citizenship: fostering favourable neighbourhood values and safe environments in local communities.

We are committed to acting ethically and require that our suppliers and contractors run their businesses within the same ethical framework, deriving from this Policy and our Business Conduct Policy.

Key considerations

EVRAZ values the differences that a diverse workforce brings to an organization. This Policy requires our directors, officers and employees; contractors; and business partners to adhere to our principles in the following areas:


Diverse Board

EVRAZ's board should reflect the diverse nature of the business environment in which the Group operates and appoint directors on merit, in the context of the skills, experience, independence and knowledge which the Board requires to be effective. The Board is also committed to ensuring gender diversity.

Recruitment & Employment

EVRAZ's diversity initiatives will be applied, but not limited to: our practices and policies on recruitment and selection; compensation and benefits; professional development and training; promotions; transfers; social and recreational programs; layoffs; and terminations. This will develop a working environment built on the premise of gender and diversity equity that encourages and enforces:

- Respectful communication and cooperation between all employees.

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- Teamwork and employee participation, permitting the representation of all groups and employee perspectives.
 - A work/life balance through flexible work schedules to accommodate employees' varying needs.
 - Employer and employee contributions to the communities we serve to promote a greater understanding and respect for diversity.
 - An environment where people feel safe to speak up in case of concerns.

As an employer, we are responsible for ensuring that our staff do not discriminate against, harass or victimise anyone they come into contact within the course of their work. We ensure that no job applicant or employee receives unfavourable treatment on grounds of race, nationality, ethnicity, sex, age, disability, marital status, sexual orientation, religion or belief. Entry and progression within EVRAZ is determined solely by the application of objective criteria, personal performance and merit.

We will not discriminate against any person on the grounds of their age. We are committed to recruiting and retaining employees whose skills, experience, and attitude are suitable for the requirements of the various positions regardless of age. No age requirements will be stated in any job advertisements on behalf of the Company.

Rights of disabled people

EVRAZ pays close attention to the needs of disabled people. Managers of the Group are required to:


- take reasonable measures to retain the services of an employee who becomes disabled, for example, through training, the provision of special equipment or reduced working hours;
- include disabled people in training/development programmes;
- give full and proper consideration to disabled people who apply for jobs, having regard to making reasonable adjustments for their particular aptitudes and abilities to allow them to be able to do the job.

Empowering women

Women's empowerment is essential to advancing human rights protections globally and to reaching the Gender Equality United Nations Sustainable Development Goal - achieving gender equality and empowering all women and girls. We also believe that women in leadership bring better performance.

Development and training

EVRAZ will ensure that no employee is disadvantaged in the provision of appropriate training and development opportunities. Training is provided in order to increase the knowledge

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and skills of employees and all training course materials and content will reflect the Company's position as an equal opportunity employer.

Zero tolerance towards bullying and harassment

EVRAZ seeks to embed a culture which eliminates bullying and harassment. Everyone should treat others with the respect and dignity that they would expect for themselves. Bullying and harassment of others in any form will not be tolerated and will be dealt with under EVRAZ's disciplinary procedures.

Implementation

The implementation of the Policy is the responsibility of our managerial and operational functions. To promote and ensure compliance with our commitments, EVRAZ's staff should:


- strictly observe this Policy while operating with one another inside the Group as well as with any counterparties from external business relationships;
- develop and maintain a business free from discrimination, where every employee has the opportunity to contribute to our overall results and to realize their abilities and potential;
- know and comply with all applicable laws and regulations related to diversity and inclusion issues;
- be proactive in fostering diversity and inclusion issues both inside EVRAZ and in communication with counterparties and other stakeholders;
- eliminate or minimize the lack of women representation in executive positions in the whole EVRAZ's structure;
- immediately report any violation of the rules and requirements of this Policy to a supervisor.

We will develop and implement training on this Policy for our key employees and business partners, and report on our progress to the Board of Directors.

Reporting and remediation principles

To prevent and minimize the risks of anyone in EVRAZ being harassed on the ground of diversity, we have created a confidential and round-the-clock hotline through which anyone can report their concerns about any kind of breaches in EVRAZ or our suppliers. We will protect employees who raise their concerns in good faith, even if they turn out to be mistaken. We are committed to ensuring no employee suffers any adverse treatment as a result of reporting in good faith their concerns or suspicions of discrimination or harassment taking place in our business or in any of our supply chains.

Any claims or allegations made which are found to be malicious or vexatious will result in disciplinary action being taken against the employee.

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The Group operates two separate confidential whistleblowing lines:

- 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>

Our governance and monitoring

EVRAZ's senior executives will regularly monitor and review the effectiveness and efficiency of this Policy and report to the Board of Directors. All senior officials of the Group will demonstrate in practice their personal commitment to diversity and inclusion issues, ethical behaviour and compliance with this Policy.

We welcome queries from our stakeholders. Questions regarding the content and application of the Policy can be addressed to our Sustainability team: Sustainability@evraz.com.

Review

The Policy is to be reviewed on a regular basis and, if needed, may be amended at any time to reflect business developments or changes to international or local regulations, if any.