

Anti-Corruption Policy

EVRAZ Plc

CONTENT

1. GENERAL PROVISIONS	page 2
1.1. Purpose and Objectives of the Policy	page 2
1.2. Scope of Application	page 2
1.3. Basic Terms, Definitions and Abbreviations	page 3
2. PROHIBITION OF CORRUPT PRACTICES	page 6
3. TOP LEVEL COMMITMENT	page 7
4. COMPANY'S PRINCIPLES AND REQUIREMENTS WITH RESPECT TO MOST RISKY AREAS	page 7
4.1. Gifts, Hospitality and Business Entertainment Expenses	page 7
4.2. Charitable Donations and Sponsorship	page 9
4.3. Political Contributions	page 10
4.4. Public Relations	page 11
4.5. Interaction with Authorities and Public Officials	page 11
4.6. Conflict of interest	page 12
5. ANTI-CORRUPTION SYSTEM	page 12
5.1. Identification of Corruption Risk	page 12
5.2. Anti-Corruption Function and Proportionate Procedures	page 13
5.3. Record-Keeping and Accounting	page 13
5.4. Communication with Employees; Consultation	page 14
5.5. Relationships with Contractors	page 14
5.6. EVRAZ Hot-line	page 15
6. MONITORING AND REPORTING	page 16
7. RESPONSIBILITY FOR NON-COMPLIANCE	page 16

1. GENERAL PROVISIONS

1.1. Purpose and Objectives of the Policy.

1.1.1. EVRAZ Anti-Corruption Policy (hereinafter - the “Policy”) is the underlying regulatory document establishing the key principles and requirements adopted by EVRAZ companies to prevent corruption, ensure ethical business conduct and compliance with the applicable Anti-Corruption Laws.

1.1.2. Implementation of the Anti-Corruption Policy and anti-corruption procedures ensures legitimacy, transparency and openness of EVRAZ activities to all its stakeholders.

1.1.3. The policy is a public document available on EVRAZ official Internet site.

1.1.4. This Policy is designed to:

- **ensure compliance of EVRAZ companies with the applicable Anti-Corruption Laws;**
- **summarize the main requirements of the Applicable Anti-Corruption Laws and establish the key principles and requirements of EVRAZ companies in the area of anti-corruption;**
- **formulate the fundamental rules, standards and norms of behavior that shall be adhered to;**
- **keep all stakeholders informed about “zero tolerance” of EVRAZ companies to any forms of corrupt practices.**

1.1.5. In addition to this document, the Company has approved and applies the Code of Conduct for the employees of EVRAZ Group of Companies, inextricably linked with the provisions of this Policy.

1.2. Scope of Application.

1.2.1. This Policy is mandatory for all employees of EVRAZ companies regardless of their positions during execution of their work responsibilities and/or representation of interests of EVRAZ companies in any countries worldwide.

1.2.2. Fundamental principles and requirements of the Policy equally apply to joint ventures, contractors of EVRAZ companies, including suppliers, agents, intermediaries, consultants, representatives and other individuals and legal entities. They apply to the extent such responsibilities are implied by agreements with them, stated in their internal documents, or expressly derived from the applicable Anti-Corruption Laws. EVRAZ companies offer the said persons to join in the implementation of the requirements of this Policy within the scope of corresponding contracts. The Policy and its requirements can be found by the stakeholders on EVRAZ official Internet site.

1.3. Basic Terms, Definitions and Abbreviations.

Applicable Anti-Corruption Laws:

- The United Kingdom Bribery Act, 2010;
- The United States Foreign Corrupt Practices Act, 1977;
- Any laws and regulations containing the provisions of OECD Convention on Combating Bribery of Foreign Public Officials in International Business Transactions (adopted on November 21, 1997) or the United Nations Convention against Corruption (adopted by the General Assembly of the United Nations by Resolution 58/4 at the 51st plenary meeting held in New York on October 31, 2003):
- Any other applicable anti-bribery and anti-corruption Laws of the countries of presence of EVRAZ companies.

Applicable Laws – legislative rules and requirements of the state, as well as rules and regulations of international legislative and regulatory acts and laws of foreign countries applicable to EVRAZ companies and/or their employees due to certain circumstances (for example, carrying out business activities in the territory of a particular state, terms and conditions of an agreement with any foreign contractor, etc.)

Bribe - the transfer or receipt of money, securities, other property, as well as the provision of property-related services or the provision of other property rights to an official for taking actions (inaction) in favor of the bribe giver or the persons represented by him/her for the purpose of obtaining profit or any illegal advantages, or for other wrongful purpose. For the purposes of this Policy, a bribe also includes commercial bribery.

Business Gifts - any gifts provided by the employees on behalf of and/or at the expense of EVRAZ companies to any contractors and other third parties, as well as gifts that EVRAZ companies or their employees receive from any contractors and other third parties.

Business Entertainment – any expenditure of EVRAZ companies made on behalf of Third Parties or for their benefit or any expenditure of any Third Party made on behalf and for the benefit of EVRAZ representatives associated with the establishment and/or maintenance of business cooperation made as part of the business conduct, including expenses for business meals, travel, accommodation, entertainment, etc.

Compliance Manager - a person defined by bylaws of EVRAZ companies, responsible for monitoring compliance with the applicable Anti-Corruption Laws.

Conflict of Interest - a situation when the personal direct or indirect interest of an employee or representative of the Company affects or may affect the proper objective and impartial performance of his/her official duties or the exercise of authorities. This is a situation when a contradiction arises or may arise between the personal interest of an employee and the rights and legitimate interests of the Company, when such a

contradiction can negatively affect the rights and legitimate interests, property or business reputation of the organization should he/she be its employee or representative.

Contractor – any legal entity, individual or other person established under the Applicable Law that enters into contractual (written or oral) relations, except for labor ones, with any of EVRAZ companies.

Corruption (corrupt activities, corrupt conduct) - offer, giving, extortion, promise, request or receipt of a bribe (tangible or intangible benefits in any form); mediation in bribery for the purpose of obtaining direct or indirect mercenary advantages or for any other illegal purpose; as well as other illegal use by an employee of his/her official position contrary to the legitimate interests of the Company in order to obtain benefits for himself/herself or for third parties or to carry out illegal provision of such benefits to a specified person by third parties.

Employees – individuals employed by EVRAZ companies under labor or civil law.

Facilitation Payments - provision of cash, property, property rights, services and other tangible or intangible benefits in order to ensure or accelerate the implementation of the standard procedure for the commission of legislatively established procedures or actions that, however, are not stipulated by the legislation and other regulatory legal acts of a particular country, but are related to the practice of business conduct in it.

Family - spouses, parents, children, brothers and sisters, grandparents, grandchildren.

Government Authorities – any state authorities and local self-government bodies, including legislative, executive (for example, departments, offices and government ministries) and judicial agencies.

Personal Interest - the possibility of obtaining income in the form of money, other property or property rights, property services, results of works performed or any benefits and advantages of an employee or representative of the Company. The personal interest of an employee or representative of the Company may also be expressed in the receipt of the listed profits and benefits from related parties by persons linked with him or her.

Politician – an individual professionally engaged in political activities, including any individual being a functionary in a political party.

Public Official (Official):

1) Any person performing organizational, executive and administrative functions in a temporary or permanent capacity or by special authority in:

- any authority of the federal or municipal level (legislative, executive, judicial);
- any armed forces and military units;
- any law enforcement agencies;
- any political party (other than rank and file members of a political party);

- any international public organization (e.g., International Monetary Fund, United Nations, World Bank, etc.);
- 2) Any person acting as a representative of the above mentioned bodies, entities and organizations;
 - 3) Any candidate for a position in the above mentioned bodies, entities and organizations;
 - 4) A foreign official (employee of a foreign country) recognized as such by the Applicable Laws).

Related Parties - persons who are in close relationship with an employee or representative of the Company (parents, spouses, children, brothers, sisters, as well as brothers, sisters, parents of spouses and spouses of children), citizens and entities to which an employee or representative of the Company and persons who are in close relationship with the said employee or representative of the Company are connected by property, corporate or other close relations.

Senior Officials – Chief Executive Officers/Directors, EVRAZ Vice-Presidents, Functional Managers, other persons performing managerial functions in EVRAZ companies.

Third Parties – any individuals who are not employees of EVRAZ companies, any legal entities not included in EVRAZ structure.

2. PROHIBITION OF CORRUPT PRACTICES

2.1. EVRAZ companies adhere to the principle of “zero tolerance” to any forms of corrupt practices within their business activities, while executing projects and interacting with the government authorities, officials (public officials), politicians, investors, contractors, partners and other persons.

2.2. EVRAZ upholds zero tolerance to corruption. This means a strict prohibition for all persons subject to this Policy, directly or indirectly, personally or through third parties, to participate in any corrupt activity in any country of the world, regardless of their business practices. The persons subject to this Policy are strictly prohibited to:

- give, offer or promise bribes;
- receive, ask for or extort bribes;
- provide mediation in bribery;
- tamper with officials (public officials), including foreign ones;
- make facilitation payments in favor of the authorities, as well as officials, public officials and other persons, including foreign ones.

If an employee of the Company is forced into corruption, such employee shall immediately notify the person responsible for monitoring compliance with the applicable

Anti-Corruption Laws (compliance manager). In accordance with the internal procedures, this person shall validate the information and organize an investigation into the incident details. If, based on the results of an internal investigation, the described circumstances really qualify as bribery or corruption with the participation of an official, in accordance with the Applicable Laws, the information shall be communicated to the competent law enforcement authorities, as well as to the Audit Committee of the Board of Directors.

2.3. EVRAZ guarantees that the employees who refuse to participate in corruption will not be held liable even if, as a result of such a refusal, EVRAZ loses its commercial and/or competitive advantages and/or incurs losses that could be avoided only in violation of the applicable Anti-Corruption Laws and/or this Policy.

3. TOP LEVEL COMMITMENT (“Tone from the Top”)

All senior officials of EVRAZ companies shall demonstrate in practice their personal commitment to ethical behavior and compliance with the requirements of the applicable Anti-Corruption Laws and EVRAZ internal regulations, including this Policy.

“Tone from the Top” is necessary to create a corporate culture based on the principles of honesty, openness, objectivity, as well as an implacable attitude to any forms and manifestations of corruption.

4. COMPANY’S PRINCIPLES AND REQUIREMENTS WITH RESPECT TO MOST RISKY AREAS

4.1. Gifts, Hospitality and Business Entertainment Expenses.

4.1.1. Business gifts, hospitality and business entertainment expenses are an integral part of standard business practices and establishment of sustainable business relationships with the Contractors. However, due to the fact that certain types of business gifts, hospitality and business entertainment expenses may influence the decision-making process and/or contradict provisions of the applicable Anti-Corruption Laws, EVRAZ companies establish mandatory requirements to such Business Gifts, hospitality and business entertainment expenses. These requirements are specified in this Policy and other internal regulations of EVRAZ companies, in particular in local policies on business gifts, hospitality and business entertainment.

4.1.2. The senior officials and employees of EVRAZ companies are prohibited from requesting, demanding or inducing third parties to grant gifts to them or their family and/or to pay for business entertainment and hospitality.

4.1.3. It is prohibited to provide and accept business gifts, hospitality and business entertainment, if they may affect the outcome of any transaction and/or beneficiary’s

decisions in favor of the person (business) who granted such gift, hospitality and/or business entertainment.

4.1.4. EVRAZ companies refrain from providing business gifts to public officials, politicians and their family, as well as paying any expenses for or on behalf of such persons, including obtaining financial and/or other advantages by such persons at the expense of EVRAZ (for example, in the form of payment for transport, accommodation, meals, entertainment, etc.), except for the expenditures related to participation of these persons in the official events organized and/or financed by EVRAZ companies.

In exceptional cases, it is possible to provide business gifts, hospitality and business entertainment in favor of public officials. Such actions shall be carried out within the framework of the requirements of the applicable Anti-Corruption Laws, and the corresponding business gifts, hospitality and business entertainment expenses shall be subject to prior approval by the manager responsible for monitoring compliance with the applicable Anti-Corruption Laws.

4.1.5. Granting and accepting business gifts, hospitality and business entertainment are permitted only if the following requirements are met:

Legitimacy.

The business gifts and hospitality shall comply with the applicable laws, as well as principles and requirements of EVRAZ company's internal regulations, including this Policy.

Justification (reason, purpose).

The business gifts and hospitality:

- shall be directly associated with business activities of EVRAZ companies or official and professional holidays;
- shall not be made with the intention (direct or indirect) to influence decisions that have an impact on the business activities of EVRAZ companies or with other unethical and illegal purposes;
- shall not impose any obligation on a recipient of a business gift or hospitality;
- shall not constitute remuneration (including hidden) for the services rendered or works performed, or future works/services.

Economic feasibility.

The business gifts and hospitality:

- shall be bona fide, reasonable and proportionate to a specific event;
- shall not be expensive or of luxury nature.

Types.

The business gifts or hospitality shall not be in any form of money, petty cash, securities, precious metals, gift certificates or other cash equivalents.

Transparency:

The business gifts and hospitality:

- shall be presented or given openly, that is, in a context that does not allow ambiguous interpretation;
- shall not create a reputational risk to EVRAZ companies, their employees and/or other persons in case of disclosure of the information about such business gifts, hospitality and business entertainment expenses.

4.1.6. All above requirements shall apply to provision and acceptance of business gifts, hospitality and business entertainment by the employees of EVRAZ companies both directly and via intermediaries.

4.1.7. When accepting business gifts, hospitality and business entertainment in the course of execution of their work responsibilities and/or representation of interests of EVRAZ companies, the senior officials and employees shall ensure that such business gifts, hospitality or business entertainment expenses comply with EVRAZ anti-corruption principles and requirements.

The cost of any business gift received or given by the senior officials or employees of EVRAZ companies, and the cost of business entertainment expenses are defined in the relevant internal regulations of EVRAZ companies.

Granting or receiving business gifts, hospitality and business entertainment in excess of the specified limit is subject to prior approval by the manager responsible for monitoring compliance with the applicable Anti-Corruption Laws. All such cases shall be reflected in the appropriate register.

4.1.8. All business gifts granted on behalf and/or at the expense of EVRAZ companies, as well as provided hospitality and incurred business entertainment expenses are recorded in the accounting.

4.1.9. All employees of EVRAZ companies are personally responsible for compliance with these requirements.

4.1.10. Additional information on the approval of business gifts and hospitality, as well as reporting requirements, is contained in the relevant provisions of corresponding policies on business gifts, hospitality and business entertainment expenses adopted by EVRAZ companies.

4.2. Charitable Donations and Sponsorship.

4.2.1. EVRAZ is a socially responsible company that carries out charitable donations and sponsorship activities, helping build a favorable social environment for the development of business, local communities, government institutions and programs.

4.2.2. Charitable donations and sponsorship activities of EVRAZ companies shall meet the following key criteria. They:

- shall comply with the provisions of the applicable Laws, principles and requirements of this Policy, Code of Conduct and internal regulations of EVRAZ companies;
- shall be directly or indirectly associated with pursuing business interests and/or achieving statutory goals of EVRAZ companies;
- shall have a positive effect on reputation of EVRAZ companies and be effective in achievement of social and public purposes;
- shall not be intended to influence decisions of government authorities, public officials and other persons to obtain, retain or expand business activities of EVRAZ companies or gain any commercial and/or competitive advantage and shall not constitute remuneration (including hidden) of such persons.

4.2.3. EVRAZ companies do not participate in political activities in any of the countries of presence, do not sponsor political parties, or make political contributions or donations. EVRAZ companies do not make charitable donations for the benefit of public officials, government authorities, and political parties, neither do they support organizations and programs aimed at changing legislation, as well as political and military organizations and projects. EVRAZ companies refrain from charity work in favor of religious organizations. However, they may provide direct charity support within individual projects proposed by the above mentioned persons, provided that such charity activities are in compliance with the established anticorruption principles and requirements of EVRAZ companies.

4.2.4. All charitable donations and sponsorships are subject to prior approval by corresponding EVRAZ officials in accordance with the procedures specified in internal regulations of EVRAZ companies. All charitable donations and sponsorship shall be recorded in a special register.

4.2.5. EVRAZ companies ensure control over the proper application of funds granted within the framework of charitable and sponsorship activities.

4.2.6. Charitable donations and sponsorship operations are recorded in the accounting of EVRAZ companies. In addition, key information about charitable and sponsorship activities shall be disclosed on the official Internet website of EVRAZ, in the Annual Report or by any other means.

4.3. Political Contributions.

4.3.1. EVRAZ companies do not show preferences for political parties and movements, do not participate in political activities in order to influence the adoption of favorable decisions, and do not finance parties and movements, as well as their representatives.

4.3.2. However, EVRAZ companies acknowledge the right of their employees to be personally involved in political activities at their leisure time. Such participation:

- shall be carried at own expense and in leisure time of the employees;
- shall not be associated with EVRAZ;
- shall neither infringe their rights nor breach their official duties in the course of their employment by EVRAZ companies.

4.4. Public Relations.

4.4.1. All public relations activities carried out by EVRAZ companies shall be aimed at promoting the image and business reputation of EVRAZ.

4.4.2. EVRAZ companies do not pay for any publications in the press and/or broadcasts in mass media aimed to promote the personal image of any third party so that the latter then took decisions in favor of a EVRAZ company.

4.4.3. All public relations events and activities carried out by EVRAZ companies shall meet the following key requirements:

- be in compliance with the applicable laws and EVRAZ corporate documents;
- be directly connected with the business activities of EVRAZ companies;
- be reasonable and proportionate to the significance of the specific occasion (including the format of event);
- shall not constitute remuneration (including hidden) and/or shall not influence any decision-making process in favor of any of EVRAZ companies and/or their employees;
- shall not create reputational risk for EVRAZ companies, their employees and/or other persons in case of disclosure of information about events being held and/or funded.

4.5. Interaction with Authorities and Public Officials.

4.5.1. EVRAZ companies do not make facilitation payments in favor of any government authority, public officials or other persons. EVRAZ companies do not engage intermediaries to interact with them. In exceptional cases, if this does not contradict the applicable Laws and if there is an objective need to involve an intermediary, EVRAZ companies ensure a fair and transparent process when selecting such an intermediary and paying for its services.

4.5.2. EVRAZ companies refrain from paying any expenses for public officials or their family (in their interests), as well as persons associated with them in order to obtain commercial advantages or to provide any other benefits for the projects of EVRAZ companies.

4.5.3. The employment and civil law contracts with former state and municipal employees are made in strict compliance with the requirements of applicable Laws.

4.6. Conflict of interest.

4.6.1. EVRAZ respects the right of its employees to personal time and business. Moreover, nothing shall create a conflict between the employee's personal interests and the Company's interests. When fulfilling their duties and/or representing the interests of EVRAZ, the employees shall be guided by the principles and requirements of this Policy, the Code of Conduct, as well as the provisions of the internal regulatory document governing the prevention, disclosure and settlement of conflicts of interest.

4.6.2. The employees:

- shall not allow situations leading to a conflict of interests, and be guided exclusively by the interests of EVRAZ companies when making decisions within the framework of their duties;
- shall not use their position or information they have access to in their personal interests or in the interests of related parties;
- shall disclose information about personal circumstances that may lead to a real and/or potential conflict of interest, both situationally (when applying for a job, when being appointed to a new position, in case of occurrence), and as part of a regular survey about its presence/absence.

4.6.3. The internal regulations adopted by EVRAZ companies set steps to prevent and disclose conflicts of interest as well as determine the procedure for resolving them. Such documents also provide examples of relevant typical situations along with the ways to deal with them.

5. ANTI-CORRUPTION SYSTEM

5.1. Identification of Corruption Risk.

5.1.1. EVRAZ companies identify and assess on a regular basis the corruption risk they face in each country where they operate.

5.1.2. EVRAZ companies acknowledge the necessity of corruption risk management irrespective of its probability and impact. Corruption risk management is performed taking into account specifics of all business lines and areas of the activities of EVRAZ companies.

5.2. Anti-Corruption Function and Proportionate Procedures.

5.2.1. EVRAZ companies have a special function to ensure compliance with the applicable Anti-Corruption Laws and anti-corruption principles and requirements of internal regulatory documents of EVRAZ companies, including this Policy.

5.2.2. Within this function, EVRAZ companies appointed persons responsible for monitoring compliance with the applicable Anti-Corruption Laws who shall:

- ensure the implementation and effective functioning of anti-corruption procedures and measures stipulated by this Policy and other internal regulatory documents;
- monitor and control compliance with anti-corruption policies;
- provide verification of candidates and counterparties;
- approve the most risky operations and transactions;
- carry out other activities stipulated by anti-corruption requirements of EVRAZ companies.

5.2.3. In addition to anti-corruption provisions set forth in this Policy, EVRAZ companies have other control procedures within their functional and business areas of activity that aim to ensure appropriate and sufficient control environment in EVRAZ companies. These procedures are worked out and honed to mitigate the corruption risk.

5.2.4. All new projects and areas of business in EVRAZ companies are analysed for risks of violating applicable Anti-Corruption Laws, own anti-corruption principles and requirements of this Policy.

5.3. Record-Keeping and Accounting.

5.3.1. Accounting and records of EVRAZ companies are maintained in full compliance with the requirements of the applicable Laws and EVRAZ internal regulations.

5.3.2. All business transactions and financial operations are timely accounted for with appropriate level of detail, accurately and correctly. They are supported with necessary appropriate documentation and are available for review in accordance with the requirements of the applicable Laws.

5.3.3. Misrepresentation and falsification of bookkeeping, tax and management accounting and reporting data is strictly prohibited and constitutes a breach of the applicable Laws and EVRAZ internal regulations.

5.4. Communication with Employees; Consultation.

5.4.1. EVRAZ companies are consistently building an appropriate anti-corruption culture of ethical business conduct. All newly hired employees are required to familiarize themselves with the fundamental internal documents - the Anti-corruption Policy and the Code of Conduct. EVRAZ companies provide training in accordance with the applicable Anti-Corruption Laws, as well as principles and requirements of EVRAZ companies. The management of EVRAZ companies and persons responsible for monitoring compliance with the applicable Anti-Corruption Laws are also the source of information and counseling to the employees. Internal regulatory documents that further expand on the principles set forth here, for example, in terms of giving and accepting gifts, resolving

conflicts of interest, and charity, are freely available on the internal portal. Brief significant information concerning the content of anti-corruption policies is posted on the corporate website.

5.4.2. EVRAZ employees shall be familiar with this Policy and regularly confirm their adherence to and compliance with the anti-corruption principles and requirements specified in the Policy.

5.4.3. EVRAZ employees who are in doubt if their actions comply with the provisions of the applicable Anti-Corruption Laws and/or principles and requirements of this Policy should apply for guidance to the person responsible for compliance with the applicable Anti-Corruption Laws or the head of their structural unit.

5.5. Relationships with Contractors.

5.5.1. EVRAZ companies do not engage any agents, consultants, representatives and other intermediaries to make payments and/or take any actions contradicting the provisions of the applicable Anti-Corruption Laws and requirements of EVRAZ internal regulations, posing any risk to EVRAZ business reputation and/or business reputation of EVRAZ employees when performing their official duties.

5.5.2. EVRAZ companies ensure the objective and transparent contractor selection process enabling to mitigate the corruption risk.

5.5.3. To avoid the risk of starting relations with contractors of doubtful reputation EVRAZ companies:

- **conduct due diligence procedure to verify business reputation and contractors' tolerance to corruption;**
- **check for the absence of conflicts of interest;**
- **inform counterparties and partners about their commitment to anti-corruption principles, as well as about zero tolerance to their violations;**
- **include into agreements with contractors special anti-corruption provisions which require compliance with the applicable Anti-Corruption Laws and mutual notification of the parties of any facts of corrupt behavior of employees or affiliates.**

5.6. EVRAZ Hot-line.

5.6.1. EVRAZ companies encourage their employees and contractors to report to EVRAZ Hot-line the facts of involvement of their employees in corrupt practices when performing their official duties should they become aware of such cases using the established communication channels.

5.6.2. Principles of EVRAZ Hot-line:

- the right to remain anonymous when reporting corrupt behavior. However, the applicant should realize the difficulties EVRAZ faces when analyzing and reviewing information, conducting internal investigations where necessary, and taking appropriate measures, as there is no opportunity to clarify received information and interact with the applicant afterwards;
- the guarantee of personal confidentiality: EVRAZ companies, within their powers and capacities, ensure confidentiality of information about the person who reported a violation to the Hot-line, except as otherwise required by the applicable Laws;
- non-prosecution of persons who have applied to the Hot-line: EVRAZ companies guarantee that the employees who in good faith reported facts of corruption practices performed by other EVRAZ employees will not be subject to any liability in connection with the circumstances of the reported violations;
- unbiased and timely consideration of received messages: EVRAZ companies reserve the right not to consider the information reported to the Hot-line if it contains obscene language or if it is provided with the purpose of:
 - spreading information known to be false, slanderous, etc.;
 - setting personal accounts and achieving goals that are in conflict with the interests of EVRAZ companies;
 - harassment, expression of threats to life and health of EVRAZ employees, their relatives and family;
 - distributing promotional information, providing data not directly related to the business of EVRAZ companies;
 - other similar purposes that are contrary to the scope and nature of the Hot-line.

5.6.3. Providing knowingly false information by EVRAZ employees or other persons to the Hot-line shall constitute a breach of this Policy and the relevant provisions of the applicable Laws. The breaching person may be liable to prosecution in accordance with the applicable Laws and EVRAZ internal regulations.

6. MONITORING AND REPORTING

6.1. EVRAZ companies shall regularly monitor and review the effectiveness and efficiency of implemented control procedures and anti-corruption actions, assess their adequacy, proportionality and relevance, as well as improve them due to identified control environment deficiencies and/or changes in the applicable Anti-Corruption Laws and/or international best practices.

6.2. In addition, EVRAZ companies regularly conduct internal and external audits of business activities, review efficiency of internal control systems and its compliance with the applicable Anti-Corruption Laws and associated EVRAZ internal regulations, including this Policy.

6.3. The results of reviewing whether EVRAZ companies comply with the applicable Anti-Corruption Laws, how effective and adequate their corresponding controls are, become reported to the Audit Committee and other EVRAZ authorities on an annual basis. The results of above work shall be made public on the official Internet website of EVRAZ, in the Annual Report or by any other means.

7. RESPONSIBILITY FOR NON-COMPLIANCE

7.1. Adherence to the anti-corruption principles and requirements of this Policy is the responsibility of each employee of EVRAZ companies, regardless of his/her position. The employees of EVRAZ companies are personally liable for non-compliance with the requirements and procedures defined by this Policy and other internal regulatory documents reviewed and signed off by employees.

7.2. Compliance with the anti-corruption principles and requirements by the employees is considered the most important professional competence and is taken into account when considering them for promotion, corporate awards or bonuses.

7.3. Upholding the principle of zero-tolerance to any corrupt practices, EVRAZ would initiate internal investigations with respect to each reasonable suspicion or identified fact of corrupt behavior in accordance with the requirements of the Applicable Laws and EVRAZ internal regulations.

7.4. The employees who violate the anti-corruption principles and requirements of this Policy shall bear responsibility to the extent stipulated by the applicable Laws and EVRAZ internal regulations.