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## **Code of Conduct for EVRAZ Employees**

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## PURPOSE AND OBJECTIVES OF THE CODE

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Employee's Code of Conduct - the document that reflects the business philosophy of the Company and the fundamental principles, underlying the corporate culture and ethics of EVRAZ, and the Company expects that all employees shall comply with the same. On its part, EVRAZ undertakes to create comfortable and safe working environment that will allow employees to achieve success and develop their professional and creative skills.

The Code applies to all EVRAZ enterprises around the world. Regardless of the level of your position at the Company, here you will find useful information, including how to behave in a certain situation at work.

The Code contains:

- practical information on compliance with laws and applicable rules at the Company;
- recommendations as to how to build relationships with colleagues, customers, suppliers, contractors, communities, government bodies and shareholders;
- links to useful sources of information;
- answers to the most frequently asked questions.

## MISSION OF EVRAZ

We are an international mining and metallurgical company. Creating additional value for our clients in infrastructure projects, we strive to make the world stronger, cleaner and safer!

## PRINCIPLES OF EVRAZ BUSINESS

### Daily improvement

By constantly developing and introducing new ideas, we contribute to the sustainable growth of our company.

### Attention to the consumer

By constantly improving products and services, we strengthen long-term relationships with our customers and clients

### Result and responsibility

We persistently strive to achieve the set goals and are responsible for the result

### Active team work

We succeed in the team of like-minded people

### Concern for people

Creation of safe working conditions, development of our employees and local communities are an important part of EVRAZ business

### EVRAZ BRAND

EVRAZ BRAND - is an integral part of the image, which emphasizes our uniqueness and distinguishes EVRAZ from the general mass of other companies, reflects the unity of our enterprises, mines, sales offices and the managing office within the same Company, as well as promotes our products and services in the market.

Our motto: *Making the world stronger!*

## OUR PEOPLE


### RESPONSIBILITY OF EMPLOYEES

It is important that, working at EVRAZ, each of us should understand and respect the principles of doing business of the Company, being guided by the requirements of the Code, as well as the effective procedures and regulations.

It is necessary that all the employees of EVRAZ comply with the principles and requirements contained in the Code. It is also important to strive to ensure that the business partners of EVRAZ, including contractors, suppliers, agents and consultants, also adhere to these requirements.

If you are in doubt about what to do, and whether you should draw attention to a particular problem, ask yourself simple questions:

- Does this comply with the Code and the business principles of EVRAZ?
- Does it correspond to my personal values?
- Can this directly or indirectly cause harm to anyone or be dangerous?
- Does this contradict the law?
- Does this contradict the norms of ethics?
- Have I considered all the alternatives?

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If you have doubts about the correctness of a certain decision, you can always contact your supervisor, as well as leave a message or a question on the EVRAZ Hot Line. Contacts of the Hot Line are indicated in the corresponding section of the corporate portal.

If your question remains unanswered, and the problem is not resolved, insist on receiving a response and a solution. Do not remain indifferent!

## RESPONSIBILITY OF MANAGERS

The EVRAZ management is responsible for maintaining high ethical business standards. Remember: you are the leaders responsible for creating an atmosphere, where the Company's employees are provided with all the necessary facilities for the effective and safe implementation of the assigned tasks. The task of the manager is to encourage work in strict accordance with the corporate culture and ethical values of EVRAZ, as well as to discuss emerging issues, take care of the development of employees, by personal example demonstrate adherence to the principles of strict compliance with the law, ethical standards and safety rules.

The Company's management is also responsible for creating a business risk management system that allows quickly identifying, preventing and effectively responding to possible problems, violations, omissions and inconsistencies.

### YES

- By personal behavior demonstrate an example of an ethical approach to doing business;
- Make sure that employees know and understand the main provisions of the Code and other procedures and regulations of the Company;
- (Create an atmosphere, where the employees are not afraid of expressing their opinions and discussing emerging issues;
- Encourage employees to follow the business principles of the Company;
- (Respond promptly and fully to employees' questions, related to business processes;
- Monitor and enforce the provisions of the Code and other procedures and regulations of EVRAZ.

### NO

- Never encourage the achievement of a result at the cost of violating legal requirements, ethical standards and safety requirements.

## EQUAL RIGHTS AND OPPORTUNITIES

EVRAZ seeks to develop and maintain a non-discriminatory working environment, where each employee has the opportunity to contribute to the overall result and implement their capabilities and potential.

EVRAZ strives to provide all employees with equal opportunities, complying with the principles of respect for human rights, and expects that employees will also adhere to such principles in their daily work.

All employees and candidates are assessed according to their professional skills and qualities, experience and abilities. Decisions, made on the basis of reasons that are not relevant to the qualifications and effectiveness of the employee or candidate (for example, based on race or ethnicity, gender, religion, political beliefs, nationality, age, sexual orientation, citizenship, marital status, disability, etc.) are discriminatory and prohibited by the law and the principles that govern the Company.


Child labor, bonded labor, human trafficking and other forms of slavery (known as “modern slavery”) are strictly prohibited at all EVRAZ subsidiaries and by their suppliers. Modern slavery is a criminal offence in the UK and other jurisdictions. Modern slavery is also an abuse of human rights. We are committed to acting ethically and, in so far as we can reasonably do so, to require our suppliers to carry out their businesses within the same ethical framework.

We conduct risk assessments to determine which parts of our business and which of our suppliers and subcontractors are at risk of modern slavery. We engage with our suppliers regarding modern slavery issues and this Policy and understand better the steps they have taken to prevent modern slavery in their businesses. Where appropriate, if determined by our risk assessment, we conduct diligence on our suppliers and we are in the process of introducing obligations on high-risk suppliers to comply with legal obligations to eliminate modern slavery in their businesses and to self-report breaches to us.

In some regions of the EVRAZ operation, there are laws that correct historically unequal labor rights and opportunities. If the rules of such laws are contrary to the Code, field managers shall explain to employees the use of corporate policies in such cases. EVRAZ strives to comply with both the requirements of the Code and the norms of the law, but its policy shall not apply so as to breach the law.

EVRAZ operates a hotline through which employees can report their concerns about breaches of this Code of Conduct to management of EVRAZ. Any concerns about suspected modern slavery within the business of EVRAZ or our suppliers can also be reported to the employee’s next level of management, the legal department or any Director of EVRAZ.

However reports are made, we will protect employees who raise their concerns

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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 his or her concerns or suspicions of modern slavery taking place in our business or in any of our supply chains. Although anonymous reporting is possible, it does render investigations more difficult and can make the process more protracted and possibly also less effective. Individuals are therefore encouraged to put their names to allegations.

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

Every EVRAZ employee can count on:

- the opportunity to openly and constructively discuss the results of their work with the manager;
- the support in the development of their competencies and skills;
- the recognition and material remuneration depending on the results of both their personal activities and the activities of the Company as a whole;
- honest, respectful attitude and the provision of equal opportunities.

YES

- Demonstrate respect and objectivity in relations with employees and partners of EVRAZ;
- Strive to ensure that decisions on hiring, promotion, development, compensation and dismissal are based solely on the merits of the specific people, in whose respect this action is carried out and the requirements of business;
- Take into account the requirements of local legislation and cultural traditions;
- If you have any questions, please contact the legal or HR department.

NO

- Do not allow actions, based on discrimination on such grounds as race, age, sex, religious and political beliefs, sexual orientation, nationality, ethnicity, citizenship status, family status, disability, etc.

## RESPECT FOR PEOPLE

Respect for people is one of the main principles of the Company, which is as follows:

- Communication shall be correct, based on respect for the personality of the interlocutor and his/her opinion, regardless of whether you agree with him/her or not. Aggressive behavior of any kind is unacceptable.
- EVRAZ unites representatives of different cultures, and we request that each culture should be respected, provided that the components of such

a culture do not violate the provisions of this Code. If local cultural characteristics are contrary to the provisions of the Code, the employee shall immediately inform his/her supervisor about this.

- Any communications between the Company, its units, as well as suppliers and contractors shall be exclusively business-like.
- Decisions in relation to other employees, clients, counterparts, suppliers and contractors shall be based on objective data and facts, not allowing discrimination.

#### YES

- Respect colleagues, build up your communication with them in the atmosphere of courtesy and mutual understanding;
- Make decisions, based on objective data and facts, not emotions.

#### NO

- Do not allow abusive, discriminatory, degrading or aggressive statements and jokes;
- Do not ignore cultural differences;
- Do not allow unwanted hints, questions, jokes, gestures and statements of overtly sexual order, as well as various kinds of verbal and behavioral manifestations of a sexist nature;
- Do not distribute images or other materials that are pejorative or discriminatory in nature and offend the honor and dignity of the person;
- Do not spread rumors and do not encourage an open expression of any judgments of personal order that are provocative or discriminatory.

### HEALTH, SAFETY AND ENVIRONMENTAL PROTECTION

Occupational, industrial safety, environmental issues and health of workers, as well as the population living in the regions, where the Company operates, are a priority for EVRAZ.

The Company strives to provide employees with the safest working conditions at all of its enterprises.

EVRAZ operates in accordance with health, safety and environmental requirements. The Company also strives to use the best world practices in this field.

We think that accidents and incidents can be prevented. The Company has committed itself to providing such a level of occupational and industrial safety, where the risk of accidents is minimal and that corresponds to the current level of engineering and technology development.

The Company understands that the safe operation of production facilities, the prevention of accidents and the ability to quickly and efficiently contain and eliminate their consequences depend not only on the technological state of the production equipment, but also on the competence of the personnel and

compliance with the production discipline.

The managers of EVRAZ at all levels are responsible for ensuring the necessary level of occupational and industrial safety not only within the Company, but also within the framework of relationships with contractors. The managers of EVRAZ shall set an example of compliance with the safety rules for employees and seek their execution.

All employees are responsible for compliance with the health, safety and environmental requirements at the Company's facilities. EVRAZ will be a truly successful Company, only if every employee of EVRAZ and contracting companies safely returns home to their families after a work shift.

#### YES

- Stop any work, if it becomes unsafe;
- Proceed only to the work, in which you are trained and certified, and also suitable for medical reasons;
- Use personal protective equipment, overalls and special shoes;
- Strictly observe the state and corporate requirements in the field of occupational and industrial safety in the performance of your work duties;
- In case of any doubts or questions, please refer to the recommendations of the immediate supervisor or specialists in the field of health and safety;
- If you see that any employee violates established rules and requirements for health and safety, immediately warn the violator and report a violation to his/her immediate supervisor.

#### NO

- Do not disable the locking of equipment and tools without appropriate sanctions;
- Do not hide or distort the facts and circumstances of accidents at work;
- Do not start work without prior training, if you have not previously been involved in this type of work or do not have the skills to work on this equipment.

#### ATTITUDE TO USING ALCOHOL, DRUGS AND SMOKING

The effects of alcohol, narcotic drugs, toxic, psychotropic and highly toxic substances endanger the life and health of the employee and his/her colleagues, increasing the risk of accidents.

Consumption and distribution of alcohol and drugs is prohibited at all EVRAZ enterprises. Violation of this rule entails disciplinary responsibility, including dismissal. An exception can be made for cases, when an employee is forced to take medications, prescribed by a doctor. The employee is obliged to warn the superior manager about the need to take such medications, if this can lead to a decrease in employee productivity or safety.



If you drink alcohol in your free time, you must be sure that coming to work you will not create a threat to your own life and the lives of your colleagues. You also have to be prepared to pass the appropriate test.

At social and corporate events held by the Company, alcohol consumption is possible, only if the management agrees.

It is definitely proved that smoking increases the incidence rate, shortens life expectancy and worsens its quality. Therefore, the rule of “smoke-free territories” was introduced at EVRAZ (offices, production sites, motor vehicles). The exception is zones, specially designated and properly isolated from workplaces.

At production sites, the Company has the right to carry out a preliminary medical examination in accordance with the current legislation in order to exclude the admission of afflicted persons or chemical dependents, as well as persons under the influence of alcohol and drug intoxication, under the influence of psychotropic drugs and other strong drugs.

If you notice the use, possession and distribution of drugs and alcohol on the premises of the enterprise or in the office, warn the violator and immediately report a violation to your supervisor. Remember that the possession and use of drugs is not only prohibited by the Company's policy, but it is also illegal and may lead to criminal prosecution.

#### NO

- Do not stay in the territory of the enterprise under the influence of strong medicines, in a state of drug and / or alcohol intoxication;
- Do not use or bring alcohol, narcotic, toxic, psychotropic and strong poisonous preparations to the territory of the Company's enterprises (with the exception of drugs, prescribed for use for health reasons);
- Do not smoke at the workplace in the territory of the Company, including the areas, where contractors operate;
- Do not smoke in vehicles belonging to the Company or used for official purposes;
- Do not pass by and adequately react to the facts of consumption (storage, distribution) of alcohol and drugs at the Company's facilities, take actions that help to identify, prevent and suppress such cases.

## OUR CORPORATE ETHICS

### PROTECTION OF COMPANY ASSETS

The assets of EVRAZ are assets, money, information, intellectual property, as well as equipment used on an individual basis, such as mobile phones and computers.



To avoid theft, damage or misuse of the Company's assets, all necessary precautions shall be taken. EVRAZ assets cannot be sold, loaned, pledged, destroyed or disposed of without proper authorization.

Every employee of the Company is responsible for protecting the Company's assets from theft or damage.

It is necessary to ensure the use of EVRAZ assets in strict compliance with the Company's rules and their proper accounting. Inadequate use of assets creates obstacles in the work, causes damage to the Company and its shareholders. Unauthorized or improper use of assets entails responsibility in accordance with the laws.

#### YES

- Try to prevent the loss, damage or theft of EVRAZ assets;
- Keep accurate records of financial transactions, related to EVRAZ;
- Observe the requirements of EVRAZ and the legislation regarding the use and transfer of assets;
- Close rooms, where there are no personnel (if this does not contradict the technological requirements and the norms of industrial safety).

#### NO

- Do not use offices and premises of EVRAZ for personal purposes;
- Do not use EVRAZ equipment for non-work activities;
- Observe the internal routine in force at EVRAZ;
- Do not copy keys to EVRAZ premises without proper authorization.

#### INTELLECTUAL PROPERTY

Intellectual property is the property of EVRAZ similar to tangible assets. Intellectual property is of high value to the Company, and its protection is extremely important.

Intellectual property shall mean:

- Patents for new or improved products or processes;
- Trademarks and service marks, as well as commercial designations;
- Design (form or appearance of goods);
- Rights to original materials of the Company;
- Rights to computer programs and databases;
- Secrets of production ("know-how");
- Confidential and official information.

EVRAZ actively encourages and supports innovation and technical development. The rights to items of intellectual property, created by employees

in the course of their labor activity, belong to the Company. The Company pays employees a remuneration for the use of intellectual property in accordance with the procedure, established by law and the Company's rules.

The EVRAZ brand is one of the Company's most valuable assets.

YES

- Treat the information, received during the work, as EVRAZ property;
- Observe the confidentiality of all intellectual property items of EVRAZ;
- If it is necessary to disclose confidential information to third parties, ensure that they comply with the confidentiality regime with respect to such information.

NO

- Do not install unlicensed software on EVRAZ computers;
- Do not share confidential information obtained concerning work with others, unless it is necessary and done in accordance with procedures, established by the Company.

#### COMPUTER AND COMMUNICATION SYSTEMS

Information technology (IT) systems used by the Company, including systems for access to e-mail and the Internet, are the property of the Company. They shall be used mainly for business purposes and in accordance with the Company's IT policy.

The use of IT systems for any illegal or immoral purposes, as well as for harassment of colleagues at work is unacceptable.


EVRAZ provides employees with a password-protected access to the Company's IT services. Within the framework that does not contradict the current legislation, in order to ensure confidentiality and protection of resources from unauthorized access, the Company can monitor the operation of information systems and have access to the corporate e-mail of the employee.

EVRAZ respects intellectual property rights. All software and hardware that is used by the Company is licensed and purchased with respect for copyrights.

YES

- Inform the IT specialist of any unauthorized use, copying or sale of software;
- Be careful when opening emails from unknown senders or by running programs and applications, obtained from unknown or untested sources;
- Always protect access to your computer systems with a safe password.

NO

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- Do not share your computer password with other people;
  - Do not install unlicensed software and hardware;
  - Do not take part in viewing, storing, downloading or publishing materials that are unethical;
  - Do not allow your work computer to be used by third parties.

#### GIFTS AND HOSPITALITY EXPENSES

Receiving, as well as granting gifts, paying hospitality are standard practices of business cooperation and business ethics. At the same time, it is important to note that such actions shall not influence the Company's activities and decision-making processes, which shall be justified, realized and based solely on the current market conditions.

EVRAZ employees shall be cautious when receiving gifts from counterparties, as well as assess the costs, incurred by counterparties for business entertainment purposes. Special care should be taken by employees in cases, where the value of gifts received is unreasonably large or incommensurable with the usual practice of business communication.

The same principles of prudence should be adhered to in paying hospitality for counterparties and business partners.

If you have any questions in this regard, please contact your supervisor or the person, responsible for monitoring and compliance with anti-corruption procedures.

## YES

- Notify the person, responsible for monitoring and compliance with anti-corruption procedures, about the receipt or granting of gifts, as well as the payment of hospitality for amounts exceeding the standards of normal business cooperation;
- Be tactful when rejecting gifts and other benefits, whose value is unreasonably large or incommensurable with normal business practices;
- Always evaluate the likely conflict of interest in each case of receiving or granting gifts and paying hospitality.

## NO

- Do not accept gifts or other tangible or intangible benefits from counterparties or business partners, participating in tenders, organized by EVRAZ;
- Do not accept gifts or other tangible benefits, whose value is unreasonably large or incommensurable with normal business practices.

## ANTI-CORRUPTION REGULATIONS


EVRAZ does not accept any form of corruption.

EVRAZ confirms compliance with the requirements of applicable anti-corruption legislation, including, among others, the documents listed below:

- Federal Law No. 273-FZ dated December 25, 2008 “On Anti-Corruption”;
- Federal Law No. 115-FZ dated August 7, 2001 “On Combating the Legalization (Laundering) of Proceeds from Crime and Financing of Terrorism”;
- UK Bribery Act, 2010. (UK Bribery Act, 2010),
- (Foreign Corrupt Practices Act, 1977); (Foreign Corrupt Practices Act, 1977),
- any legislative instruments and by-laws expressing provisions of the OECD Convention on Combating Bribery of Foreign Public Officials in International Business Transactions) (concluded on December 17, 1997), or the United Nations Convention against Corruption accepted by the United Nations General Assembly (Resolution 58/4 dated October 31, 2003).

EVRAZ prohibits a proposal or promise from its representatives and employees of any financial rewards, gifts, benefits to government employees and officials with the aim of influencing their decision, gaining any advantages, gaining loyalty or avoiding liability.

Following this general principle, payments or contributions are also forbidden to

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simplify formalities; such payments or contributions are banned in most countries and are equated with corruption or bribery. At the same time, EVRAZ recognizes that in exceptional cases such contributions or payments are allowed. These are cases when the safety, life or health of employees or members of their families depend on their implementation, or when such payments or contributions correspond to good business practices.

The Company seeks to cooperate with partners and counterparties, whose reputation is not tainted by facts, related to corruption and bribery.

#### YES

- Agree on the implementation of payments or contributions, aimed at facilitating formalities with employees, responsible for monitoring and compliance with anti-corruption procedures, and/or the Board of Directors;
- Prudently select business partners in order to prevent negative impact on the reputation of EVRAZ;
- Bring to the attention of partners and counterparties the Company's principles, aimed at preventing corruption;
- Make sure that all expenses, related to doing business, are properly and correctly reflected in the financial statements;
- Comply with the rules and principles for the prevention of corruption and bribery by partners and counterparties and notify the employee, responsible for monitoring and compliance with anti-corruption procedures, about the facts of violation of these rules.

#### NO

- Do not participate in schemes and activities, aimed at unjust enrichment, obtaining incommensurable compensation and benefits, commissions and remunerations;
- Do not commit actions, aimed at providing government employees and officials with financial means, gifts, benefits in order to obtain advantages or priorities in business;
- Do not use affiliated or third parties for the purpose of illegal and unlawful activities;

- Do not finance and do not pay from personal funds gifts, compensation, commission, etc., aimed at obtaining a preferential or priority position in various business activities.

## CONFLICT OF INTEREST

EVRAZ respects the right of its employees to private time and personal business. However, none of this should create a conflict between the personal interests of the employee and the interests of the Company.

A conflict of interest can arise in the following cases:

- the employee is in a leadership position and his/her job responsibilities include making decisions that affect the activities of EVRAZ;
- the employee is engaged in parallel business or works part-time;
- the employee invests in the activities, competitive to the business of EVRAZ;
- the employee uses his/her official position for personal purposes.


If you have any questions, please contact your supervisor.

## YES

- Do business and make decisions based on market conditions and in accordance with the principles of good business practice;
- Avoid situations and actions that may lead to a conflict of interest;
- If there is a conflict of interest:
  - *Notify the person responsible for the control and compliance with the anti-corruption procedures, and the legal service about the presence of personal interest;*
  - *Refrain from making a decision, in which you have a personal interest;*
  - *Refuse to carry out activities that constitute competition to the EVRAZ business.*
- When getting a part-time job, get approval from your supervisor.



NO

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- Do not occupy positions, do not work part-time and do not invest in companies or industries that are competitive to the EVRAZ business;
  - Do not lobby your interests, the interests of your relatives or affiliates for the purpose of concluding transactions or contracts with EVRAZ on terms other than the market ones;
  - Do not accept gifts, cash awards, commissions, other benefits from competitors, partners and counterparties that may affect the integrity and reasonableness of the evaluation in the decision-making process;
  - Do not abuse your official position in order to satisfy your personal interests.

#### INSIDER INFORMATION

Insider information - is official information that is not publicly available and the distribution of which is likely to have a significant impact on the value of EVRAZ securities.

Insider - is a person, having insider information or access to it.

Insider information can be:


- financial results and dividends of the Company;
- knowledge of actual or possible mergers, acquisitions, establishment of joint ventures;
- offers of takeover;
- specific details of transactions for sale and purchase;
- current and long-term litigations.

YES

- Take all necessary measures to maintain the confidentiality of information.

NO

- Do not buy or sell shares of EVRAZ and do not participate in other transactions with EVRAZ shares, owning insider information, including directly or through members of your family, or by entrusting such transactions to third parties;
- Do not disclose insider information to anyone outside the Company, including family members, without prior permission. Within the Company, it is allowed to disclose insider information only to the employees, who need it to perform their official duties, and only with

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prior authorization. If you disclose insider information to any person, who will then carry out transactions with securities on the basis of such information, both you and that person will be convicted of a crime;

- Possessing insider information, do not advise others to carry out transactions with securities, officially registered on the exchange.
- Do not voice insider information in public places. The misuse of insider information can lead to criminal liability.

## OUR PARTNERS

### COOPERATION WITH GOVERNMENT BODIES

EVRAZ activities fall under state regulation and largely depend on the decisions of state bodies and departments. EVRAZ cooperates with state authorities, observes laws and norms of law.

EVRAZ employees, directly interacting with government bodies, shall ensure the completeness and reliability of the information provided, as well as its compliance with the appeals and requirements of the law. Errors, delays or refusals to provide information can adversely affect the reputation of EVRAZ and entail responsibility for both the Company itself and its employees.


Economic interaction with public authorities is permissible, only if it does not contradict anti-corruption legislation. Such cases are subject to mandatory prior approval with the employee, responsible for monitoring and compliance with anti-corruption procedures and the Company's management, subject to legal and financial documents.

EVRAZ also insists that all counterparties, working with the Company and/or acting on its behalf comply with the norms of the current and anti-corruption legislation.

### YES

- Counteract corruption where possible;
- Communicating with state representatives, remember that the most important is cooperation and constructive dialogue;
- Provide accurate and truthful information to public authorities;
- Make sure that the counterparties, who work with the Company or act on behalf of the Company, comply with all norms of anti-corruption legislation;
- If you have any questions regarding interaction with representatives of public authorities, consult the employee, responsible for monitoring and compliance with anti-corruption procedures or the legal service of the Company.

## NO

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- Do not transfer, do not charge and do not promise to transfer valuable items and monetary sums to government officials in order to influence their decision;
  - Do not try to interfere with the lawful collection of information by public authorities;
  - Do not hide or distort information or data that have been requested by government bodies or that shall be provided in accordance with applicable law;
  - Do not use unfairly received information on tenders or auctions, conducted by government agencies regarding possible new business areas that may be of interest to EVRAZ.

## RELATIONS WITH POLITICAL PARTIES AND PUBLIC ORGANIZATIONS

EVRAZ does not participate in political activities in any of the countries of operation.

EVRAZ does not sponsor political parties, does not make political contributions or donations. EVRAZ respects political views of its employees, with the exception of those that are unlawful or extremist in nature. Persecution for political reasons in the Company is considered unacceptable.

The EVRAZ employees can participate in political processes within the limits of the exercise of their constitutional rights, in this case their social and political activities shall be separated and not connected with the Company. Participation in political actions shall be carried out only in their free time.

EVRAZ employees, who are running for political office, shall inform the Company of their political activities in order to exclude a conflict of interest.

## YES

- Remember that your cooperation with political organizations, movements, funds and candidates (within the framework of their election campaigns) can affect the reputation of EVRAZ. Do everything in order to prevent possible negative impact;
- When dealing with representatives of political organizations, act in accordance with the provisions of this Code and all applicable legal and judicial norms, including anti-corruption legislation;
- Participating in political processes as an individual, be sure to indicate that you act on your behalf and do not represent the interests of EVRAZ. Separate your personal political interests and attachments from the business interests of EVRAZ;
- If you encounter cases of discrimination for political reasons, inform your manager or the Company's Hot Line about this;
- If you decided to run for a political post, inform the management of

the Company about it.

NO

- Do not make contributions or donations to political parties, movements, funds, candidates, using the financial resources of EVRAZ, its subsidiaries or affiliates;
- Do not exert pressure or influence on colleagues in the context of their political views and preferences. The only exceptions are cases, where such views or preferences are illegal or extremist.

#### RELATIONS WITH SUPPLIERS AND CONTRACTORS

EVRAZ strives to maintain effective and clear relations with suppliers, contractors and counterparties that provide the Company with products or services, and this can directly affect the Company's prospects, its financial performance, revenue and reputation.

The Company conducts an honest procurement policy, providing equal opportunities to potential partners, suppliers and counterparties. During the selection process EVRAZ informs them about the Company's expectations and requirements, namely:

- Carry out their activities strictly within the law;
- Provide working conditions that meet the highest standards of occupational health and industrial safety;
- Take care of minimizing any negative impact on the environment;
- Respect the rights of employees and representatives of the local community.

YES

- Strive to conduct business only with the suppliers and contractors, who comply with the requirements of applicable legislation;
- Try to get a commercial offer, profitable to the Company;
- Carefully analyze the activities of a potential supplier and/or contractor (experience, qualifications, reputation, compliance with EVRAZ standards, existing relationships with the Company);
- When starting to work with a supplier, a contractor or a counterparty, conclude a confidentiality agreement with them. This will prevent the leakage of information, important for EVRAZ.

NO

- Do not enter into contracts with companies, whose activities may harm the environment or the well-being of local communities;
- Do not transfer confidential information about a supplier, a contractor or a counterparty to others;

- Do not accept gifts or other tangible or intangible benefits from potential business partners, participating in tenders, organized by EVRAZ.

#### WORK WITH AGENTS, CONSULTANTS AND OTHER PERSONS

Such business partners include companies outside the EVRAZ perimeter that act for the benefit of, for and on behalf of EVRAZ – agents, brokers, consultants, joint venture partners, investors, law firms, tax advisors, etc. The selection of such companies shall be carried out with special care, because their unethical behavior or inappropriate actions can adversely affect the reputation of EVRAZ and even lead to administrative or criminal prosecution.

Be sure to investigate all aspects of the activities of a possible business partner before entering into any agreements with them.

Relations with such partners shall be documented.

#### YES

- Check, whether there is a likelihood of corruption or other possible violations from a potential business partner;
- Prepare work with similar business partners in advance when necessary;
- Clearly explain to such business partners the expectations of the Company;
- Report violations by such a business partner of the provisions of the Code and/or the legislation to your supervisor and to the legal service of the Company.

#### NO

- Do not ignore possible violations of the legislation by a business partner.

#### COOPERATION WITH LOCAL COMMUNITIES

Transparent and constructive interaction with local communities is an integral part of the activities and development of EVRAZ. The Company believes that its activities should have a positive impact on the lives of people, living in the regions, where the enterprises and offices of EVRAZ are located.

All the Company's social investments are aimed at strengthening and further development of the partnership relations between EVRAZ and the local community. The Company supports projects that improve the quality of life in the regions, where the Company's facilities and offices are located.

Priority lines of social investments for EVRAZ are as follows:

- Young people: initiatives and projects that promote the development of the younger generation;
- Education: assistance to people of all ages in acquiring new knowledge, skills and habits;
- Civil projects: strengthening of good neighborly relations with local communities and improvement of the environmental situation in the regions, where the enterprises and offices of EVRAZ are located.

In order to ensure a unified approach in all territories of its operation, EVRAZ does not finance organizations and programs, aimed at changing legislation, as well as political, military, religious organizations and projects.

#### YES

- If you interact with employees of EVRAZ enterprises in other countries, remember about the difference between cultures and traditions. Respect views and traditions different from those, to which you are accustomed;
- Take into account the views and expectations of parties concerned, especially those that are directly influenced by the activities of EVRAZ.

#### NO

- Do not give preference to representatives of any political, religious or ethnic group;
- Do not support political, religious or ethnic organizations on behalf of EVRAZ;
- Do not support projects that could result in destabilization of the situation in the region, violation of human rights, damage to the environment or human health.

*More detailed information about the Company's social activities can be found in "The Main Lines of Social Investments for EVRAZ". The document is available on the Company's website ([www.evraz.com](http://www.evraz.com)) in the Sustainable Development section.*

#### INTERACTION WITH OUTSIDE AUDIENCE

EVRAZ is a public company, whose shares are traded on London Stock Exchange. In this regard, the Company shall comply with a number of requirements and restrictions on the disclosure of corporate information, which are imposed by the rules of the stock exchange and the United Kingdom Listing

Authority (UKLA).

EVRAZ undertakes to ensure timely, consistent and complete informing of all parties concerned about the Company's activities. First of all, this applies to any information that may affect the price of shares. Inaccurate and untimely provision of information may adversely affect the price of the Company's shares.

Disclosure of information is carried out only by employees, who have the appropriate authority.

EVRAZ can provide corporate information at the request of public authorities. At the same time, the Company shall demand the provision of confidentiality regime, and inform officials, who received such information that it is confidential and is not subject to disclosure to other persons.

Communication with the press belongs to the competence of the VP's Corporate Communications Unit. Any communication with the press of any employees of the Company is possible only in consultation with the employees of the Corporate Communications Unit.

YES

- If you received a request for the provision of corporate information or any comments from representatives of external audiences (journalists, officials, members of public organizations), redirect it to the staff of the VP's Corporate Communications Unit;
- If your work requires the disclosure of confidential information to others, enter into a confidentiality agreement with them;
- If you have any doubts regarding the provision or disclosure of information, please consult the legal service or the specialists of the VP's Corporate Communications Unit;
- By posting photos from production sites or commenting on the Company's work on social networks, consider that this may affect the reputation of EVRAZ.

NO

- Do not comment on rumors or assumptions, circulating on the market;
- Do not respond to requests for corporate information, if you are not authorized to do so, or if you are not authorized by an authorized representative;
- Do not respond to press inquiries and do not participate in interviews without first obtaining appropriate authority from the staff of the VP's Corporate Communications Unit;
- Do not share confidential corporate information with your family members or friends.




*More detailed information can be found in the Disclosure Rules of EVRAZ. The document is available on the Company's website ([www.evraz.com](http://www.evraz.com)) in the Corporate Governance section.*





## COMPLIANCE WITH THE PROVISIONS OF THE CODE

A vertical decorative bar on the left side of the page, composed of multiple horizontal bars in yellow, orange, and red, mirroring the colors of the EBPA3 logo.

The provisions and requirements, set forth in this Code, shall apply to all employees of the Company, without exception. If a violation is detected, it is necessary to communicate this information to your manager, as well as to leave a message or a question on the EVRAZ Hot Line. Contacts of the Hot Line can be found in the relevant section on the corporate portal. All information is treated with confidentiality, and violations are investigated in accordance with established procedures.