

## On EVRAZ Hot Line

### 1. GENERAL PROVISIONS

- 1.1. The EVRAZ Hot Line (hereinafter referred to as the “Hot Line”) is a single channel of intra-corporate communications, intended to receive information and feedback from the employees of EvrazHolding (hereinafter referred to as the Company), by employees of enterprises, in respect of which the Company exercises the powers of the sole executive body (hereinafter referred to as the operated enterprises) and other persons. The EVRAZ Hot Line operates within the framework of the official procedures and policies of EVRAZ, including within the framework of the Anti-Corruption Policy of the Company.
- 1.2. All previously existing channels for obtaining information and feedback from the Company's employees and employees of the operated enterprises, such as hot lines, boxes for collecting requests to the management of operated enterprises, etc., shall be connected to a single EVRAZ Hot Line and cannot operate separately from it.
- 1.3. The work of the EVRAZ Hot Line is in the area of responsibility of the Vice President, Corporate Communications Unit; the daily management of the Hot Line is the responsibility of the Hot Line Administrator (hereinafter referred to as the Administrator), acting under this Regulation and the Administrator's Instructions.
- 1.4. Situations, not covered by this Regulation, shall be considered by the representatives of the interested functions (hereinafter referred to as the Committee) with the participation of representatives of the Vice-President's Corporate Communications Unit, including the Administrator, the Internal Audit Service, etc. The meeting of the Committee may be initiated by both the Administrator and the compliance officers (the list according to Annex 1).
- 1.5. The work of the Hot Line is organized in accordance with Moscow time.
- 1.6. The Company reserves the right to use the messages, received through the Hot Line and the information, contained therein, in whole or in part, for further processing, analysis and / or publication in corporate media and for providing to external sources, subject to the confidentiality of personal data of the Applicant.
- 1.7. The regulation on the work of the Hot Line applies to all employees of EvrazHolding and the operated enterprises.

## 2. OBJECTIVES AND PRINCIPLES OF USING THE HOT LINE

### 2.1. Directions of the Hot Line functioning

2.1.1. Employees of the Company and the operated enterprises, as well as other persons (former employees, veterans, representatives of suppliers, customers, etc.) (hereinafter collectively referred to as the Applicants) have the right to apply to the Hot Line for:

2.1.1.1. Receiving answers to questions, arising from the activities of the Company and the operated enterprises;

2.1.1.2. Making proposals on issues, ensuring the improvement of the financial and economic performance of the Company and the operated enterprises;

2.1.1.3. Reporting on possible violations of rules on labor protection, industrial and environmental safety, internal policies and procedures, codes, documents of the Company and the operated enterprises;

2.1.1.4. Reporting on possible violations of the applicable laws of the Russian Federation; on fraudulent actions, including theft, corruption and other actions, affecting the safe-keeping of the assets of the Company and the operated enterprises and other violations and misdemeanors;

2.1.1.5. Reporting on other issues, related to the activities of the Company and the operated enterprises.

### 2.2. Unacceptable targets for using the Hot Line

2.2.1. It is not allowed to use the Hot Line for spreading information which is known to be false, slanderous, etc.; settlement of old scores, achievement of personal goals that are contrary to the interests of the Company and the operated enterprises; harassment, expression of threats to life and health of the Company and operated enterprise Employees and their family members and close relatives; distributing promotional information, providing data not directly related to the business of the Company and operated enterprises; other similar purposes that are contrary to the scope of the Hotline.

2.2.2. On the basis of the results of the initial review the Company reserves the right to ignore appeals that can be classified as transmitted with a goal, unacceptable for the Hot Line.


### 2.3. Methods of sending messages to the Hot Line


2.3.1. The applicants can transmit messages on the issues, stipulated in clause 2.1, through any of the following information channels:

2.3.1.1. dedicated free telephone line (8-800-555-88-88): incoming appeals are kept for 5 years on a separate


network resource, the access to which is limited and provided to certain categories of employees (clause 4.2).


Calls to the toll-free telephone line are accepted by the Administrator from 9:00 a.m. to 6:00 p.m. Moscow time on business days; the answering machine is available outside these hours.


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- 2.3.1.2. e-mail [vopros@evraz.com](mailto:vopros@evraz.com) and [hotline@evraz.com](mailto:hotline@evraz.com): the appeals are stored in the Microsoft Outlook program in the archive of incoming messages of the corresponding electronic mailboxes for 5 years.
  - 2.3.1.3. *intracorporate portals of the operated enterprises and the portal of the Company*: incoming appeals remain in the recording register for 5 years.
  - 2.3.1.4. *Hot Line section on the external corporate website evraz.com*: the appeals are stored in the Microsoft Outlook program in the archive of incoming messages of the corresponding electronic mailboxes for 5 years.
  - 2.3.1.5. *other information transmission channels*: appeals, received through other channels of information transfer, shall be sent as soon as possible to the mailbox [vopros@evraz.com](mailto:vopros@evraz.com), for further processing by the Hot Line Administrator.
  - 2.3.2. The Hot Line Administrator is not authorized to transfer a call, addressed to the Hot Line for connection with a superior employee of the Company or with other persons at the request or on demand of the applicant.
  - 2.4. Message format
    - 2.4.1. Messages to the Hot Line can be sent by applicants in any format convenient for them.
    - 2.4.2. In order to speed up and simplify the further procedure for handling appeals, it is recommended that they include the following information: area / direction of appeal or category of issue (according to the classification of appeals, given in Annex 1); name of the enterprise and the unit in question; in the event of an appeal for a violation and/or an event:
      - 2.4.2.1. The date and time of the violation/event or time period, if the event had a recurrent / continuing nature;
      - 2.4.2.2. Name and/or position of the violator/employee, responsible for performing the duties that are the subject of the appeal;
      - 2.4.2.3. Brief description of the violation / event (including specific material facts and circumstances, significant details, possible reasons);
      - 2.4.2.4. Full name and/or position of the Company's employees, who may be aware of the violation/event and confirm or supplement the information reported;

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- 2.4.2.5. Possible consequences of the violation/event and/or damage to the Company, which are known to the Applicant.
  - 2.4.3. If the Applicant has communicated any information about the violation/event to the Company's employees or third parties prior to applying to the Hot Line, it is necessary to indicate the full name and position of the Company's employees, who received this information, if available, to provide the result of consideration / discussion.
  - 2.4.4. Provision of personal data, including: telephone number/address/e-mail address/position/full name/employee number, etc., remains at the discretion of the Applicant.
  - 2.4.5. Messages coming from people, who are in alcoholic or narcotic intoxication, as well as in an inadequate, heightened emotional state, are not accepted and are not submitted for further consideration. The decision to refuse acceptance of an appeal is made by the Hot Line Administrator independently, on the basis of obvious signs of intoxication / inadequacy of the Applicant, the lack of meaning in the appeal, the presence of signs of hooliganism, the use of obscenities, In this case, the Administrator is obliged to inform the Applicant about the refusal to receive the message and offer to apply to the Hot Line via e-mail. In case of repeated calls of the same person in the same condition, the Administrator of the Hot Line can send an application for the telephone number blocking to the Users Technical Support Service of the Company.
- 2.5. Anonymous submission of messages
    - 2.5.1. When applying to the Hot Line, the Applicant has the right to remain anonymous.
    - 2.5.2. The Administrator is obliged:
      - 2.5.2.1. To draw attention of the person, who did not provide his/her personal data, to the difficulty of considering an anonymous message due to the lack of opportunity to clarify the information received and further interaction with the Applicant.
      - 2.5.2.2. If there are personal data in the message of the Applicant or in case of their provision later on, including as a result of clause 2.5.2.1, it is necessary to clarify with the applicant, whether he/she agrees to the data transfer:
        - To the persons, responsible for carrying out an investigation with possible transfer to local leaders;
        - Only to the management company;
        - Only for feedback upon completion of the investigation.
3. SECURITY WHEN APPEALING TO THE HOT LINE
    - 3.1. Guarantee of confidentiality
      - 3.1.1. The Company, within the limits of its powers and available capabilities, ensures the confidentiality of information about the identity of the Applicant.
      - 3.1.2. The Administrator transmits the messages, received through the Hot Line for further verification, investigation and preparation of the response without specifying the personal data of the Applicant, except for the cases,


when the Applicant verbally or in writing has confirmed his/her consent to the transfer of his/her personal data to the Compliance Officers, and the fact of confirmation was recorded in a letter or audio recording of the conversation between the Administrator and the Applicant.

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- 3.1.3. The Administrator, the compliance officers (hereinafter referred to as the Compliance Officers) and other persons, having access to the Hot Line (according to subclause 4.2.1 of this Regulation) shall not have the right to disclose the personal data of the Applicant, as well as to transmit information, received through the Hot Line containing data, on the basis of which it is possible to determine the identity of the Applicant, to other employees of the Company or third parties. The cases provided for by the current legislation of the Russian Federation may be an exception.
  - 3.1.4. The Company shall not be liable for the confidentiality of information about the identity of the Applicant, if he/she voluntarily, including by negligence, disclosed the fact of his/her application to the Hot Line to other employees of the Company or to third parties.
  - 3.1.5. In the absence of feedback from the Applicant, the subject of the appeal is considered on the basis of available information.
  - 3.2. Waiver of prosecution
    - 3.2.1. The prosecution of persons, applying for the Hot Line from the side of the Company and the operated enterprises is prohibited, except for cases, provided for by the current legislation.
    - 3.2.2. The Company guarantees that for the fact of applying to the Hot Line, the Applicants will not be subjected to sanctions, including dismissed, demoted, deprived of the premium, etc.
    - 3.2.3. The Company reserves the right to bring the Applicant, who provided false information to the Hot Line, to responsibility in accordance with the policies of the Company and the operated enterprises and on the basis of the current legislation.
  4. PROCEDURE FOR CONSIDERATION OF MESSAGES AND SUBMISSION OF RESPONSES
    - 4.1. Registration and classification of appeals
      - 4.1.1. All Hot Line appeals are classified (in the form of Annex 1) and registered in a single reporting register (in the form of Annex 2) within two business days from the date of receipt. The status of their consideration is monitored and updated by the Administrator from the moment of receipt and until the moment of closing.


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- 4.1.2. The current reporting register is placed on a separate network resource, access to which is limited and provided only to the following categories of employees: Vice President, Corporate Communications; Internal Communications Director; Internal Audit Director; Hot Line Administrator.
- 4.1.3. The received appeals can be considered in standard or special procedure. Appeals with subject meeting at least one of the following criteria are considered according to the special procedure:
- affects one or more representatives of senior management of the Company and/or the operated enterprises (from the director level and above);
  - contains information about the unlawful action or its potential risk, whose estimated damage to the Company and/or the operated enterprises exceeds RUB 1,000,000;
  - reports a violation that is durable and ongoing, or a potential violation that can be prevented.
- 4.1.4. A special procedure for consideration provides for the registration of the appeal in a single reporting register, the compilation and transmission of a letter on the appeal received to the compliance officer (hereinafter referred to as the Compliance Officer) for further consideration and decision within 1 business day from the receipt of the appeal.
- 4.1.5. Appeals that do not meet the criteria, specified in clause 4.1.3. of this Regulation, shall be registered and submitted for review and decision in the standard manner in accordance with clause 4.1.1.
- 4.2. Principles for distribution of appeals for further consideration
- 4.2.1. The Compliance Officers are determined on the basis of classification of the appeal (Appendix No. 1).
- 4.2.1.1 Senior Vice President, Business Support and Interregional Relations: the work of business units, subordinated to directors for compliance with business procedures and asset protection of the operated enterprises, theft of material values, fraudulent and corrupt practices, violations of tendering procedures, etc.
- 4.2.1.2 Vice President, Health, Safety and Environment: Health, safety and environment.
- 4.2.1.3 Vice President, Corporate Communications: corporate events, corporate media, information and promotional materials, branding, Hot Line, Interaction with state and municipal authorities, interaction with external media, etc.


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- 4.2.1.4 Vice President, Procurement: the supply of workers with personal protective equipment, including the questions on the quality of the supplied PPE.
  - 4.2.1.5 Vice President, Human Resources: clause 2 of Annex 1.
  - 4.2.1.6 Internal Audit Director: persecution of the Applicants to the Hot Line.
  - 4.2.1.7 Vice President, Information Technology: aspects of the activities of the Company in the IT sphere, social issues coming from EvrazTekhnika.
  - 4.2.1.8 Vice President, Legal Affairs: judicial and legal aspects of activities of the Company and the operated enterprises.
  - 4.2.1.9 Managing Director, Trade Company: issues, related to the trading activities of the Company.
  - 4.2.1.10 Vice President, Raw Materials Sales: issues, related to sales of the products of the Coal and Ore Divisions.
  - 4.2.2. If the message affects several areas of the Company's activities and cannot be sent for consideration and decision to one Compliance Officer, the Hot Line Administrator has the right, at his/her discretion, to transfer it to several Compliance Officers, in this case the letter is sent to the Principal Compliance Officer with the other Compliance Officers in the copy. The Principal Compliance Officer is determined by the Hot Line Administrator based on the key / most extended message of the Appeal.
  - 4.3. Ensuring independence of consideration of appeals
    - 4.3.1. None of the employees can be involved in the procedure for resolving the issue, if the appeal concerns him/her personally (if there is a conflict of interest), including those responsible for the response to the appeal / for the conduct of investigation; employees, who have access to the reporting register in accordance with this Regulation; an employee, acting as the Hot Line Administrator.
  - 4.4. The order and timing of consideration of appeals received
    - 4.4.1. The minimum period for consideration of the appeal is 12 business days from the moment of its receipt to the Hot Line.
    - 4.4.2. The period for consideration of the appeal can be increased, if the consideration and solution of the question requires additional time. In this case, the Administrator notifies the Applicant (if contact information is available).
    - 4.4.3. Within 2 business days from the date of receipt of the request the Hot Line Administrator sends the information to the Compliance Officer for verification and resolution of the issue in the form of an e-mail indicating the number and assigned classification.
    - 4.4.4. The deadline for submitting the results of consideration of the appeal to the Hot Line Administrator is 5 business days from the moment of sending the appeal. Results of consideration of the appeal


are provided by the Compliance Officer through corporate e-mail as a response to the initial e-mail from the Administrator saving the original message.

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- 4.4.5. The deadline for submitting the results of consideration of the appeal can be increased, if the consideration and solution of the issue requires additional time. The Compliance Officer informs the Hot Line Administrator about the need to increase the time for consideration of the issue before the end of the minimum consideration period.
  - 4.4.6. If the response following the consideration of the Appeal or the request for an increase in the standard consideration period is not provided within 5 business days from the date of the transfer of information to the Compliance Officer, the Hot Line Administrator shall send the Compliance Officer a repeated letter indicating the time limits for the response and violation of this Regulation.
  - 4.4.7. An additional deadline for providing a response based on the results of consideration of the Appeal is 3 business days. If the response is not provided after the additional deadline, the Administrator shall inform the Vice President, Corporate Communications. .
  - 4.5. Feedback with Applicants
    - 4.5.1. Only the Administrator provides feedback to the person applying to the EVRAZ Hot Line.
    - 4.5.2. The Hot Line Administrator provides feedback to the Applicant within a period of not more than two business days from the receipt of the response from the Compliance Officer.
    - 4.5.3. The Administrator shall provide responses either verbally or in writing. The form for providing the response is determined by the Administrator. Appeals concerning issues, related to benefits, labor disputes, personal complaints, labor remuneration, violations of labor protection and industrial safety are provided orally, with the exception of frequently recurring questions, the answers to which are published in corporate media.
    - 4.5.4. If the Administrator or the Compliance Officer decides to refuse to consider the appeal, the Administrator shall notify the Applicant (if contact information is available) without giving reasons.
    - 4.5.5. The Applicants, who provided their personal data, are entitled to receive answers to the questions asked, as well as information on the status of consideration of the appeal, if the provision of such answer / information does not violate the trade secret legislation, does not disclose confidential and other information and data, attributed by the legislation of the Russian Federation to confidential information, and does not carry other risks for the Company.



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5. MONITORING AND CONTROL OF THE HOT LINE FUNCTIONING
  - 5.1. In order to ensure regular monitoring and control over compliance with the procedure for receiving, registering and processing appeals, the access to the register of appeals, archives on a dedicated network resource and electronic mailboxes [yopros@evraz.com](mailto:yopros@evraz.com) and [hotline@evraz.com](mailto:hotline@evraz.com) is provided to the Internal Audit Director, who has the right to initiate his/her own investigations on appeals to the EVRAZ Hot Line.
  - 5.2. The Hot Line Administrator makes a report on the request of the Compliance Officer.

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1. General
    - Information
    - Relationship of leaders and collectives
    - Production issues
    - Proposals
  2. HR
    - 2.1. **Labour issues**
    - 2.2. **Labor remuneration**
    - 2.3. **Training**
    - 2.4. **Health improvement**
      - 2.4.1. of employees
      - 2.4.2. of family members of employees
      - 2.4.3. of children of employees
    - 2.5. **Social programs**
      - 2.5.1. Housing program
      - 2.5.2. Assistance in providing coal to employees
      - 2.5.3. Material aid
      - 2.5.4. Non-State Pension Fund
      - 2.5.5. Other benefits
      - 2.5.6. Voluntary health insurance and collective accident insurance
    - 2.6. **Cultural and sports events**
      - 2.6.1. Professional holidays (Metallurgist's, Miner's Day etc.)
      - 2.6.2. Public holidays
      - 2.6.3. Other corporate events
    - 2.7. **Consumer services**
      - 2.7.1. Delivery of workers
      - 2.7.2. Administrative and social facilities (washing rooms, WC-and-bathroom units, lounges, cafeterias, health centers)
      - 2.7.3. Nutrition of workers (with the exception of special food)
      - 2.7.4. State of the territory of the enterprise
    - 2.8. **Interaction with with Public organizations**
      - 2.8.1. Primary trade union organization
      - 2.8.2. Council of Veterans
      - 2.8.3. Women's Council
      - 2.8.4. Youth organization
  3. H&S
    - 3.1. **Dangerous behavior of the employee**
    - 3.2. **Unsafe conditions**
    - 3.3. **Violation of Safety Code**

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- 3.3.1. Being in a state of alcoholic intoxication
  - 3.3.2. Disabling safety interlocks
  - 3.3.3. Concealing the circumstances of accidents
  - 3.3.4. Handling of explosives
  - 3.3.5. Smoking in a coal mine
  - 3.3.6. Moving on belt conveyors that are not designed to transport people
  - 3.4. **Cancellation of disciplinary action**
  - 3.5. **PPE (except quality issues)**
    - 3.5.1. Norms for the issuance of PPE and untimely issuance
    - 3.5.2. Service life of PPE
    - 3.5.3. Rules for the application of PPE
    - 3.5.4. Washing of PPE
    - 3.5.5. Other issues concerning PPE
  - 3.6. **Road safety**
  - 3.7. **Safe walking routes and illumination**
    - 3.7.1. Winter risks
    - 3.7.2. Other issues of safe routes
    - 3.7.3. Lighting
  - 3.8. **Health and physical examinations**
    - 3.8.1. Delivery of special food (milk and other equivalent foods)
    - 3.8.2. Sanitary and hygienic working conditions
    - 3.8.3. Medical examinations
  - 3.9. **Certification and permits / Training on HSE**
  - 3.10. **Safety of contractors**
  - 3.11. **Proposals for improvements in HSE**
  - 3.12. **Other not classified issues**
  - 4. Internal communications
    - 4.1. **Newspaper**
    - 4.2. **Portal**
    - 4.3. **Intra-corporate advertising companies (HSE, EBS - EVRAZ Business System, etc.)**
    - 4.4. **Corporate events**
  - 5. Security Council
    - 5.1. **Compliance with procedures and safety of assets**
    - 5.2. **Corruption and fraud**
    - 5.3. **Security**
    - 5.4. **Permits**
  - 6. TWO
    - 6.1. **Persecution of employees for contacting the EVRAZ Hot Line \_\_\_\_\_**
  - 7. Procurement
    - 7.1. **PPE supply**
    - 7.2. **Quality of supplied PPE**