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Terms and definitions

"Group" means the Company and companies of the EN+ group, ex. UC RUSAL, IPJSC and its respective subsidiaries.

"Standards" means these Supplier Standards of EN+ GROUP IPJSC.

"Company" means EN+ GROUP IPJSC, a legal entity registered in Russia under the Main State Registration Number (OGRN) 1193926010398.

"Suppliers" means suppliers, contractors and others with whom Company does business.

1. Introduction

- 1.1. As a part of the Group's commitment to being compliant with our principles of business ethics, we are dedicated to working in partnership with our suppliers, contractors and others with whom we do business (collectively "**Suppliers**") to ensure adherence to these principles.
- 1.2. While we recognize that there are different legal and cultural environments in which the companies of the Group and our Suppliers operate, we believe that compliance with principles of business ethics should be common throughout the world, regardless of location. We have designed the Standards based on our principles and values with a view to provide clarity to our Suppliers regarding our expectations.
- 1.3. We request that our Suppliers ensure compliance with the Standards set out below in their own companies and also require compliance from their respective sub-suppliers and sub-contractors.
- 1.4. The Standards stipulate requirements for responsible business practices, quality and sustainable development and shall be complied with by Suppliers of goods, works and services to the Group.
- 1.5. The Group reserves the right to monitor compliance with the Standards, either on its own, or through third-party auditors.
- 1.6. We reserve the right to require that remedial measures are taken, and to suspend or discontinue cooperation at any time, if a Supplier (its representative) is suspected or found to have committed any acts that do not comply with the principles stipulated in the Standards.



2. Scope of application

2.1. The Company expects all Suppliers and their respective suppliers and contractors to comply with the principles stipulated in the Standards.

3. Key principles

- 3.1. *Ethical business conduct and countering corruption*
 - 3.1.1. Complying with local, regional, federal and international laws.
 - 3.1.2. Ethical conduct of business operations in compliance with the requirement of zero tolerance towards any form of bribery, extortion (incl. promising, offering, giving or taking any bribe, or corrupt business practices) towards employees of the Group and officials, with prompt reporting of any supposed or actual breach of the applicable anti-corruption legislation.
 - 3.1.3. Conducting business in compliance with the requirement of zero tolerance towards corruption of the Group's employees and officials.
 - 3.1.4. Gathering competitive information by legal means and not sharing confidential information belonging to the Group or other parties unless their written permission is given, unless otherwise provided for by applicable laws and regulations.
 - 3.1.5. Ensuring transparency in the supply chain, from original source to the Group, in accordance with applicable laws and regulations.
 - 3.1.6. Reporting any actual or potential conflict of interest to the management of the respective Group company (or to the Hotline) for consideration and decision by properly authorised employees of the Group.
 - 3.1.7. Providing information relating to products, services, and prices truthfully, accurately and reliably.

3.2. Environment

- 3.2.1. Complying with applicable laws and other requirements in the field of environmental protection, including the handling of waste from operations.
- 3.2.2. Developing control systems aimed at monitoring environmental indicators.
- 3.2.3. Using energy-efficient processes and products.



- 3.2.4. Implementing the best available systems to reduce or eliminate all types of waste, including measures aimed at conservation of resources and recycling, reusing or substituting materials.
- 3.2.5. Actively participating in the management of environmental risks, identifying hazards, evaluating risks posed by them, and implementing solutions.

3.3. *Occupational health and safety*

- 3.3.1. Creating a healthy working environment and safe working conditions for all employees and subcontractors.
- 3.3.2. Ensuring and guaranteeing compliance with the applicable health, occupational and fire safety laws, use of measures to prevent occupational injuries or fatalities.

3.4. Respecting human rights

- 3.4.1. Ensuring and guaranteeing compliance with The Universal Declaration of Human Rights.
- *3.4.2.* Zero tolerance to human trafficking or use of forced labour, e.g. convict labour, involuntary labour, slave labour, hard labour.
- 3.4.3. Zero tolerance to child labour.
- 3.4.4. Zero tolerance to any type of corporal punishment, offensive behavior, discrimination or abuse of candidates or employees.
- 3.4.5. Recognizing and respecting the freedom of employees in becoming members or refraining from membership in legally recognized unions and organizations.
- 3.4.6. Adopting equal opportunity regulations or a code of business conduct prohibiting discrimination on the grounds of nationality, ethnicity, gender, religious beliefs or sexual identity (subject to statutory restrictions) and commitment to fair pay.
- 3.4.7. Safeguarding the privacy of employee and customer personal information and preventing the misuse of information in accordance with all applicable data privacy laws when collecting, storing, using, processing or sharing personal information.

3.5. Principles of continuous improvement

- 3.5.1. Maintaining an effective financial control system and publicly disclosing, where appropriate, financial results.
- 3.5.2. Preparing financial statements in accordance with the relevant generally accepted accounting principles, depending on countries of operations.
- 3.5.3. Complying with applicable laws and other requirements in field of environmental, social, and governance reporting.



- 3.5.4. Proper and accurate accounting of all business transactions in accordance with the applicable policies of record retention and limitation periods.
- 3.5.5. Ensuring that quality materials and services are supplied on time and to the Group's specifications.
- 3.5.6. Immediately communicating to the Group any internal or value chain nonconformity or other developments that may impact the Supplier's ability to provide conforming, on time performance.
- 3.5.7. Fully respecting executed agreements and contracts.
- 3.5.8. Immediately communicating issues to the Group that may impact its performance, investigating to root-cause and implementing all necessary corrective measures.
- 3.5.9. Making relevant information available upon request to those who seek to verify compliance.

4. Reporting of violations

- 4.1. To report any violation and receive advice on proper compliance with the Standards, the Group's hotline is a confidential (and, if needed, anonymous) service, available for all Suppliers and any other stakeholders:
 - + Hotline: 8-800-234-5640 (all calls are free).
 - + Emails can be sent to: signal@enplus.ru.

5. Review and revision of these Standards

- 5.1. These Standards may be amended, updated or supplemented (including by other documents) from time to time, subject to legislative changes or amendment of the Group's internal regulations.
- 5.2. The Standards and any future additions hereto or amendments hereof shall be subject to approval by the Company's Board of Directors.

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6. Miscellaneous

- 6.1. The Standards will be published, in Russian and English, on the Company's website for the general public's access (www.enplusgroup.com).
- 6.2. Please visit the Company's corporate website at https://enplusgroup.com/ for additional information about the Company's values, sustainability, compliance and other matters.