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**POLICY**

**ПЛ.12-20.6**

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APPROVED

by Resolution of OMK Board No.  
12008-Пр-12/17/1

of March 13, 2017

## **OMK CORPORATE SOCIAL RESPONSIBILITY**

Revision 0

Effective Date: March 13, 2017

Developed by:

Employee Development Directorate (12075)

Replaces the OMK Sustainable Development Policy as approved by OMK Corporate Directive No. 88 of November 1, 2007.

Moscow

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## 1 Introduction

OMK is a major employer and an outward-facing industrial group which plays a significant role in the metal markets as well as geographically in the areas where it operates. This profile requires the Company to focus on sustainable development and the need to balance stakeholder interests.

This Policy has been developed to provide clear direction as to the scope of the Company's undertakings to improve conditions for all stakeholders.

### 1.1 Mission

To manufacture metal and energy-related products that deliver maximum customer satisfaction through a balanced combination of fair pricing and beneficial properties.

### 1.2 Vision

- OMK is a manufacturer of high value-added metal products.
- OMK is a major manufacturer of off-the-shelf items and an integrated supplier of products and solutions to operators in the Russian energy sector.
- OMK has put together the best team of professionals in the Russian metal industry.

### 1.3 OMK's Principal Areas for Development

1.3.1 Improve operating efficiency, develop the production system, reduce production and ancillary losses.

1.3.2 Maintain position in and revenue from historical segments by increasing the share of custom-made products, among other things.

1.3.3 Expand the product range, develop new product lines, increase market share in the large-diameter pipe sector.

1.3.4 Integrate products and facilities, develop synergies between such products and facilities, and take full advantage of them.

1.3.5 Manage critical risks.

1.3.6 By following the precautionary principle, establish the preconditions for safety in the workplace for contractor and Company personnel; guarantee environmental protection and product excellence.

1.3.7 Develop and introduce new and safer management practices and technologies, upgrade process equipment to minimize environmental impact.

1.3.8 Improve the effectiveness of environmental protection and accident prevention.

1.3.9 Expand responsible use of resources, emphasizing the use of waste-free, energy-efficient technologies.

1.3.10 Investigate the impact of production processes on climate change and upgrade technology to meet greenhouse gas emission requirements.

1.3.11 Help realize employee potential; focus on providing a safe and comfortable working environment as well as opportunities for professional growth and career advancement.

1.3.12 Further engage employees at all levels of OMK Group management in a constructive social dialogue.

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1.3.13 Improve quality of life in the geographical areas where OMK Group does business by investing in local initiatives related to sport and healthy living, culture and art, education, environmental programmes, landscaping projects, and social business initiatives.

## 1.4 Priority Stakeholders

1.4.1 Consumers/Customers: organizations that are customers for and operators of the product.

1.4.2 Employees: individuals with whom OMK Group companies have entered into employment contracts.

1.4.3 Partners: organizations and private individuals participating in joint projects outside existing commercial contracts.

1.4.4 Contractors and vendors: organizations performing work and providing services to OMK Group companies under commercial contracts.

1.4.4 Government agencies: federal government agencies, government agencies of constituent entities of the Russian Federation and local authorities, as well as national authorities and foreign government agencies.

1.4.5 Non-governmental organizations: non-profits engaged in socially significant projects in locations where OMK operates its facilities, and international non-governmental organizations.

## 2 Purpose and Scope

### 2.1 Title

OMK Corporate Social Responsibility (CSR) Policy (hereinafter, 'the Policy').

### 2.2 Policy Objective

The Policy integrates and organizes the principles of a CSR management system within OMK Group.

### 2.3 Priorities

Priorities concerning the development of the CSR system are selected based on the strategy and mission approved by the Company's executive management and formally published stakeholder opinions, as well as current versions of international sustainable development standards.

### 2.4 Application

2.4.1 The provisions of the Policy shall be applicable to all OMK Group staff and contract employees (including those of subsidiaries and dependent and controlled entities). OMK also recommends compliance on the part of contractors and vendors.

### 2.5 Effective Term

2.5.1 The Policy shall be a regulation and a governing document that is effective in perpetuity.

## 3 Regulatory References

AA1000SES	Stakeholder Engagement Planning, Implementation, and Quality Assessment
GSSB (GRI)	Global Sustainability Standards Board: International Standard of Corporate Sustainability Information Disclosure

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OHSAS 18001:2007	Occupational Health and Safety Management Systems. Requirements
SA 8000:2014	This international social accountability standard is designed to make sure that employees enjoy benign working conditions and to monitor human rights compliance in the workplace, as well as other matters of a social nature, including remuneration
GOST R ISO 26000	Standard for Implementing Social Responsibility Principles in an Organization's Strategies, Systems, Practices, and Processes

OMK Corporate Constitution

## **4 Responsibility**

### **4.1 Revision Process**

4.1.1 The Policy shall be approved by the OMK Board.

4.1.2 The Policy shall be deemed to have been withdrawn pursuant to an OMK Board resolution.

4.1.3 Amendments to the Policy shall be made by OMK Board resolution.

4.1.4 Revisions to the existing Policy may be initiated by any group of employees or a department in an OMK Group company. Drafts shall be submitted without any special requirements as to format and shall show the previous and the new (proposed) wordings as well as the rationale for the change. A request shall be submitted to the lead Employee Relations and CSR Officer in the Human Resources Department. Based on a request, the Employee Relations and CSR Team shall hold discussions involving stakeholder representatives. Decisions to make or withhold changes and on new wording shall be made by a CSR Committee.

4.1.5 A draft resolution to amend the current Policy shall be submitted to the Board by the OMK Human Resources Department Employee Relations and CSR Team.

4.1.6 Compliance with the Policy shall be monitored by the CSR Committee.

4.1.7 The lead Employee Relations and CSR Officer shall make sure that the Policy is kept current and updated.

### **4.2 Preventing Policy Violations**

4.2.1 Every employee shall be made aware of the provisions of this Policy.

4.2.2 OMK Group's procedures for responding to direct and indirect violations of this Policy shall be communicated to every employee.

4.2.3 Notices of potential violations shall be forwarded pursuant to the provisions prescribed by corporate procedures within OMK Group companies in matters of Employee Relations and CSR.

4.2.4 Employees responsible for the implementation of partnership projects and contractor and vendor relations shall communicate the contents of this Policy to such third parties.

4.2.5 Policy compliance shall be an integral part of OMK Group employees' contractual undertakings. Any violation of the principles or provisions of this Policy may be regarded as a

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breach of undertakings within a labour relationship or misconduct, and may result in consequences prescribed by law, including disciplinary action and reimbursement of the relevant costs.

4.2.6 The text of the Policy shall be published on the OMK website and intranet portal.

## 5 Terms and Definitions

5.1 **Production Safety:** A series of interrelated measures designed to ensure compliance with the requirements of occupational, industrial, transport, environmental, and fire safety, the safety of the manufacturing processes, and wellness.

5.2 **Volunteering:** Personal contributions by individuals to resolving social, cultural, economic, and environmental issues without looking to make a profit.

5.3 **Stakeholders:** Groups who affect and/or could be affected significantly by the activities, products or services and associated performance of an organization or group (AA1000SES Standard).

5.4 **CSR Committee:** A body which consolidates information regarding the implementation of this Policy's provisions and makes decisions on the value of and the schedule for achieving key performance indicators (KPIs) on significant CSR components.

5.5 **Consolidated Risk Map for Significant Components of Corporate Social Responsibility:** A document containing a Group-wide registry of risks related to failure to comply with CSR standards and requirements.

5.6 **Corporate Charity:** A programme of targeted social investment, undertaken using Company funds and financial resources, to reduce social and environmental tensions outside manufacturing sites. Corporate charity projects and programmes have clear performance indicators, which are monitored by Company executives.

5.7 **Corporate Social Responsibility (CSR):** A control system based on statutory compliance, ethical standards, and an integrated system of management (corporate governance) designed to find a balance between stakeholders' economic, social, political, and environmental interests. An organization should regard its contribution to sustainable development as an overarching social responsibility objective (GOST R ISO 26000-2012).

5.8 **Tacit Complicity:** Failure to disclose issues regarding regular or continuous violations of the law and ethical and moral standards to the relevant government authorities.

5.9 **CSR Principles:** The principles described in the GOST ISO 26000 international standard. The Company shall apply these principles to building its own CSR management system. The provisions of this Policy include those CSR principles that are of greatest importance to the Group's stakeholders.

5.8 **Direct Complicity:** Deliberate facilitation of violations of statutes and/or moral or ethical standards in conjunction with other entities.

5.11 **Beneficiary Complicity:** Obtaining direct benefit from violations of statutes and/or moral or ethical standards committed by others.

5.12 **Significant CSR Components:** Items of equal importance to both stakeholders and the Company from the standpoint of implementing the Company's strategy and social mission.

5.13 **Sustainable Development:** A 'balanced' condition of the environmental, economic, and social system whereby modern society, while satisfying its needs, stays within environmental limits without jeopardizing the ability of future generations to meet their needs.

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## **6 OMK Corporate Social Responsibility Priorities**

### **6.1 Governance System Priorities**

6.1.1 OMK employees shall be obliged and constantly strive to comply with statutes, regulations, and the OMK Corporate Constitution.

6.1.2 OMK Group shall engage in economic activity and manage its corporate affairs in a transparent, honest, and fair manner, scrupulously and in full compliance with anti-trust regulations.

6.1.3 The governance system shall be developed based on international best practices.

6.1.4 Employees shall be involved in developing and implementing strategies, policies, and action plans designed to prevent and overcome any decision or behaviour which may result in direct or indirect harm to employees, to the Company's tangible, financial, or intangible resources, or to communities in areas where the Company operates.

### **6.2 Stakeholder Communication**

6.2.1 Stakeholders shall be engaged in making decisions, including on issues that are part of the international sustainable development agenda.

6.2.2 Transparency and accountability principles shall be developed, based on international corporate disclosure standards.

### **6.3 Anti-Corruption Practices**

Zero tolerance shall be shown for bribery, collusion, and corruption.

### **6.4 Human Rights**

6.4.1 Human rights shall be safeguarded in matters of equality, solidarity, civil and political rights, social, economic and cultural rights, and the right of subsequent generations to self-determination, peace, development, and a clean environment.

6.4.2 Any form of discrimination or forced labour shall be unacceptable.

6.4.3 Occupational health and safety, environmental protection and production safety shall be maintained.

6.4.4 Collaboration among employees shall be developed and based on approved and employee-endorsed corporate values.

6.4.5 Employees' rights to freedom of association and trade union membership shall be safeguarded.

6.4.6 Conditions in the workplace shall be such that they promote the personal and professional development of employees.

6.4.7 All Company employees shall be assured equal opportunities in full compliance with the applicable legal and contractual provisions.

6.4.8. Employees shall be paid a fair wage based on accomplishments and experience.

### **6.5 Supply Chain**

All vendor and supplier contracts shall include annexes containing guidelines on working conditions, health and safety, and the use of child and forced labour, as well as compliance provisions with respect to working conditions, industrial and fire safety, and environmental protection.

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## 6.6 Consumer Communication

The rights of consumers to purchase and utilize products that bring no harm to their health or ecosystems shall be respected. Consumers shall be provided with free access to complete information regarding the properties of products offered.

## 6.7 Care of Children

6.7.1 Neither OMK Group nor its contractors or vendors shall use the labour of persons below the age when such persons may be hired and employed (child labour) or condone employee oppression or the use of any form of forced labour.

## 6.8 Development of Operational Geographies

6.8.1 The Group shall promote a high quality of life and social and economic development in communities in areas where the Group does business.

6.8.2 Different forms of continuous dialogue and consultation through OMK's various departments shall be used to ensure transparency of information that is important to local communities.

6.8.3 Employee and non-profit charity and volunteer initiatives shall be encouraged.

## 7 Policy Implementation Activities

### 7.1 CSR Management System

#### 7.1.1 Corporate Social Responsibility Committee

a. A Corporate Social Responsibility Committee (hereinafter, 'CSR Committee') shall be set up to monitor implementation of this Policy's provisions and to consolidate all material CSR-related information within OMK Group.

b. The Committee Chair and permanent members shall be appointed by the Chairman of the OMK Board.

c. The membership, authority, and procedures of the CSR Committee shall be defined by an OMK Corporate Social Responsibility Committee Charter.

d. The CSR Committee Chair shall coordinate the holding of public hearings on issues pertaining to the implementation of this Policy.

e. By its resolution, the CSR Committee shall approve a schedule to implement an integrated system of management for human rights, product safety, anti-corruption measures, production safety, external social programmes in areas where the Company operates, communication with stakeholders (this list is not necessarily exhaustive) and shall appoint the department responsible.

f. The CSR Committee shall collaborate with other committees and working groups established within the Company to manage individual areas of OMK development that relate to OMK Group's CSR priorities.

g. The CSR Committee shall develop harmonized mechanisms to collect, consolidate, authenticate, and disclose information on CSR priorities and performance for the entire OMK Group, including: human rights, product safety, anti-corruption measures, production safety, external social programmes in areas where the Company operates, and communication with stakeholders (this list is not necessarily exhaustive).

h. The CSR Committee shall approve KPIs with respect to the CSR components defined in this Policy and monitor the implementation of action plans to achieve such indicators.

i. At its discretion, the CSR Committee shall designate departments responsible for achieving KPIs relating to the CSR components approved in this Policy.



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j. The CSR Committee shall approve a single registry of CSR risks applicable to all OMK Group companies. The materiality and probability of the risks recorded in the registry shall be assessed using Procedure M.12-35.2, Risk Assessment and Prioritization. The Committee may initiate the development of a risk assessment system relative to individual CSR components, as needed.

k. The CSR Committee shall ensure that investment projects (major development or upgrade projects) are assessed for compliance with CSR statutes, regulations, and requirements.

l. The CSR Committee shall develop recommendations for management to prevent decisions with elements of direct, beneficiary, or tacit complicity from being taken.

#### 7.1.2 Organizations Accountable for KPIs Related to CSR Components Approved in This Policy

a. Designated organizations shall keep track of indicators. The Employee Relations and CSR Team within the HR Department shall hold regular discussions (at least once a year) regarding KPI completion with respect to the identified material CSR components and shall ensure employee engagement in discussions of strategies to achieve such indicators.

b. Responsible organizations designated by the CSR Committee shall make sure that current versions of documents regarding key CSR components are available wherever they are utilized (manufacturing facilities and offices).

c. The designated organizations as defined by the CSR Committee shall be provided with specialized instrumentation and monitoring equipment to keep track of KPIs related to significant CSR components.

d. The designated organizations shall investigate incidents related to human rights, product safety, and corruption (this list is not necessarily exhaustive). Consolidated annual reports containing the outcomes of such investigations shall be submitted to the CSR Committee.

#### 7.1.3 Employee Relations and CSR Team

a. The Employee Relations and CSR Team shall keep current the registry of industry standards and regulatory requirements relative to the following key CSR components as applicable to OMK Group companies: production safety, human rights, social obligations to employees, and consumer rights.

b. The Employee Relations and CSR Team shall maintain organizational charts showing CSR-related functional duties and areas of responsibility, authority, and reporting for all employees, from senior executives down to front-line staff, including stakeholder communication.

c. The Employee Relations and CSR Team shall monitor to ensure that the consolidated risk map for identified CSR components remains current, and draft summary reports on significant risk probability trends for the CSR Committee.

7.1.4 OMK Group companies shall regularly assess KPIs related to their impact on the social conditions in their operational geographies and on the environment (including any contractor impacts). The outcomes of such assessments shall be submitted to the CSR Committee for deliberation.

7.1.5 Whenever requested by the CSR Committee, the in-house audit team shall conduct GOST ISO 26000 (or equivalent) audits and assessments of OMK Group's CSR practices for compliance with the requirements of strategic partners.

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7.1.6 When requested by the CSR Committee, the Legal Directorate shall assess OMK Group's CSR practices for statutory compliance.

7.1.7 The Purchasing Directorate shall communicate this Policy to vendors and contractors.

7.1.8 The OMK Production Safety Directorate shall develop the Policy with respect to production safety and ensure compliance. It shall develop the production safety management system, ensure that regulations are kept up-to-date, and implement production safety improvement programmes at OMK Group manufacturing facilities.

7.1.9 Occupational Safety and Environmental Protection Corporate Departments (Departments) at OMK Group facilities shall maintain current regulations, and develop and implement programmes to strengthen workplace discipline and to manage their facilities' environmental footprints.

7.1.10 HR Directorates (Corporate Departments) at OMK Group facilities shall maintain current regulations and generally coordinate labour relations in matters of human rights, personnel development, and the maintenance of a fair financial and non-financial incentive system and a balanced system of social protection and benefits.

7.1.11 Sales Directorates at OMK Group facilities shall assure consumers free access to complete information regarding the properties of products being offered, existing environmental restrictions, and recycling methods.

## **7.2 Stakeholder Communication**

7.2.1 The Employee Relations and CSR Team shall develop and keep up-to-date a stakeholder listing and shall consolidate the expectations of each identified individual stakeholder regarding OMK Group's actions (at least once a year).

7.2.2 The in-house audit function shall receive employee communications (including anonymous communications) on matters of labour relations and human rights compliance. These communications shall be forwarded to the OMK Ethics Commission to develop critical violation response plans.

7.2.3 The Employee Relations and CSR Team shall develop a corporate-wide mechanism for the entire OMK Group to communicate with local communities in operational geographies and areas of potential expansion. The Public Relations Corporate Department shall participate in collecting input from key external stakeholders in the Company's operational geographies.

7.2.4 The Public Relations Corporate Department shall publish metrics in the annual report as recommended by GRI and based on information provided by the CSR Committee. The list of metrics to be verified (externally audited) and the final annual sustainable development report shall be approved by the CSR Committee.

## **7.3 Anti-Corruption Practices**

7.3.1 The Security Directorate shall develop and keep current a functional security strategy and the relevant procedures designed to prevent and identify instances of corruption within OMK Group.

7.3.2 The Intelligent Security System Corporate Department (hereinafter, 'ISS Department') shall develop, implement, and keep current such information systems as are required to identify potential employee conflicts of interest. Based on the conflicts identified by the ISS Department, the Security Directorate shall look for personal gain on the part of employees, identify beneficiaries, and assess potential risks and the amount of real and

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potential damage to the Company. The decision to eliminate a conflict shall be made by the Board or a Board Member, pursuant to the Corporate Ethics Declaration within OMK Group.

7.3.3 The Public Relations Corporate Department shall develop and keep current a Government Relations Procedure, providing a single process to be used by OMK Group employees to communicate with government agencies in a legal and open manner, taking into account OMK Group interests.

## **7.4 Human Rights**

7.4.1 The Employee Relations and CSR Team shall develop and keep current a Corporate Constitution containing mechanisms that preclude discrimination of any kind, provide equal opportunity for all employees, and place a ban on the use of corporal punishment, mental or physical coercion, and verbal abuse.

7.4.2 The Employee Relations and CSR Team shall undertake specialized studies (at least once a year) to uncover direct or indirect discrimination within the OMK Group labour force.

7.4.3 The HR Management Department, the Security Directorate, and OMK-IT shall maintain an up-to-date employee personal data protection system.

7.4.4 The Employee Relations and CSR Team shall guarantee employees' rights to follow their cultural traditions and customs provided they are legal and compatible with manufacturing processes.

7.4.5 HR Directorates at OMK facilities shall monitor compliance with human rights regulations: eliminating discrimination, ensuring equal opportunity for all employees, eliminating child labour, and banning the use of corporal punishment, mental or physical coercion, and verbal abuse.

7.4.6 The CSR Committee shall track trade union organization reports to monitor compliance with the standards established by collective agreements.

## **7.5 Vendor and Contractor Communication**

7.5.1 The Procurement Directorate shall employ its best efforts to communicate to vendors recommendations for complying with this Policy, by suggesting they sign a single common addendum to all delivery, service, and other contracts.

7.5.2 The Procurement Directorate shall develop a qualification and certification system designed to help select those vendors and contractors that use processes and procedures that meet the needs of OMK facilities and sustainable development objectives to the greatest possible degree.

7.5.3 Vendor and contractor CSR undertakings may be documented:

- in delivery, service, and other contract annexes;
- in vendor and contractor corporate regulations and procedures.

## **7.6 Consumer Communication**

7.6.1 Organizations involved in developing new technologies and products/services shall consider possible risks to consumers and the environment posed by such innovations.

7.6.2 Organizations involved in developing new technologies shall also develop procedures that help eliminate or substantially reduce the use of substances that are toxic to humans or the environment.

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7.6.3 Organizations responsible for product quality control at OMK facilities shall implement consumer training programmes designed to explain the impact on the environment of the products and services they select, including packaging recycling technologies.

7.6.4 The CSR Committee shall make sure that the overall OMK Group product line development strategy gives priority to making products with a socially or environmentally advanced life cycle and a reduced impact on society and the environment.

7.6.5 Organizations with responsibilities for product sales shall include in consumer contracts provisions preventing human rights violations when using OMK products.

7.6.6 In the event it should become known, by analysing media reports, among other things, that human rights violations have occurred while an OMK product was being used, the CSR Committee shall initiate an investigation to ascertain the facts and determine the proper response.

## **7.7 Care for Children**

Economic Security Directorates at OMK Group facilities shall prevent children from finding their way into areas that present an increased hazard to life or health, with the exception of organized tours.

## **7.8 Development of Operational Geographies**

7.8.1 OMK Group corporate charity foundations, in collaboration with the Public Relations Corporate Department, shall develop mechanisms and hold regular consultations with representatives of different local community groups in the Company's operational geographies when identifying social priorities and community development initiatives. Ranked topics shall be put forward for discussion by the CSR Committee when the areas of focus for external social programmes are identified.

7.8.2 Organizations involved in developing new technologies or products/services shall prioritize those innovative technologies that may help solve social and environmental issues within local communities in operational geographies. The proposed technology options shall be submitted to the CSR Committee.

7.8.3 Occupational health, safety, and environmental organizations at OMK Group facilities shall develop, keep current, and implement action plans to manage the facilities' environmental components.

7.8.4 OMK Group corporate charity foundations, in collaboration with the Public Relations Corporate Department, shall use mechanisms that will help to avoid the perpetuation of community dependence on philanthropic activities when engaging in social projects.

7.8.5 OMK Group corporate charity foundations and organizations that supervise corporate volunteer programmes shall evaluate the effectiveness of charity initiatives on a regular basis, identifying improvement opportunities. The outcomes of such evaluations shall be submitted to the CSR Committee for deliberation.

## **8. Associated Document References**

### **8.1 Links to Other Corporate Standards**

8.1.1 OMK Group's Corporate Social Responsibility Policy shall be grounded in the provisions of OMK's Corporate Constitution and shall provide a detailed description of the contents of social responsibility activities.

8.1.2 The provisions of this Policy shall be used when drafting or updating any corporate documents related to CSR components.

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Corporate Ethics Declaration within OMK Group

Collective Agreements

Environmental Protection, Health, and Industrial Safety Policy

Personal Data Protection Rules

Functional Safety Strategy

ПЛ.12-21.3	Corporate Policy for Managing External Social Programmes
СТК.12-22.3	Key Components of a System to Manage Industrial Health and Safety and Manufacturing Process Safety
M.12-52.1	Vendor, Supplier, and Contractor Qualification
П.12-49.9	On the Production Safety Committee
П.12-20.2	OMK's Sponsorship and Charity Initiatives
П.12-42.20	OMK Ethics Commission
П.20-42.32	VSW Ethics Committee
П.12-20.5	OMK Partnership Competition for Charity and Social Initiatives
П.12-42.16	OMK Social Council
P.12-49.1	Government Relations
M.12-35.2	Risk Assessment and Ranking

8.1.3 Activities that implement the Policy shall be in keeping with the consolidated risk map relating to significant CSR components.

## **8.2 International Organizations and Conventions**

8.2.1 OMK shall refer back to the provisions of general business ethics rules based on: the Universal Declaration of Human Rights, the Core Conventions of the International Labour Organization ratified by the Russian Federation, and the Guiding Principles of the Organization for Economic Cooperation and Development.

8.2.2 Key manufacturing processes shall be ISO and GOST certified.

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**Change Log**

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