OMK CORPORATE SOCIAL RESPONSIBILITY

Revision 1
Enacted the 28.11.2019

Developed by:
HR Department (12101)

Replaces Policy PL.12-20.6, OMK Corporate Social Responsibility, Revision 0, approved by AO OMK Board Resolution No. 12008-Пр-12/17/1 of March 13, 2017.

Moscow
2019
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1 Introduction

OMK is a major employer and an outward-facing industrial group which plays a significant part 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.

OMK aligns its activities against the United Nations sustainable development objectives as well as the provisions of the universal business ethics rules based on the Universal Declaration of Human Rights, the Fundamental Convention of the International Labor Organization ratified by the Russian Federation, the Organization for Economic Cooperation and Development guidelines.

1.1 Mission

Manufacture metal and energy-related products that deliver maximum customer satisfaction through a balanced combination of price and useful properties.

1.2 Vision

- OMK is a manufacturer of high added-value 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 Development Focus Areas

1.3.1 Improve operating efficiency, develop the production system, reduce lost production as well 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 lines of products, 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 prudence principle, OMK establishes preconditions for safety in the workplace for contractor and company personnel, guarantees the protection of the environment and product excellence.

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

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 standards.

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 dialog.

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

1.4 Priority Stakeholder Groups

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

1.4.2 Employees: natural persons 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.

1.4.5 Government authorities: Federal government authorities, government authorities in the constituent entities, local authorities.

1.4.6 Local communities: residents of the areas where OMK Group companies operate. Their interests may be represented by non-profits as well as local authorities.

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

2 Purpose and Scope

2.1 Title
OMK Corporate Social Responsibility Policy (hereinafter, the Policy).

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

2.3 Priorities
Priorities that have to do with the development of the corporate social responsibility system are selected based on the strategy and the mission as approved by the Company's executive management, formally published stakeholder opinions as well as the 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 entities), and recommended by OMK for contractors and vendors.

2.4.2 This document's functional scope is shown in Table 1.

Table 1.

| Document Functional | Name of Legal Entity |
2.4.3 The provisions of this Policy shall be used when drafting or updating any corporate documents related to CSR.

2.5 Effective Term

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

3 Responsibility

3.1 Revision Process

3.1.1 The Policy shall be approved by the OMK Governance Board.

3.1.2 The Policy shall be deemed to have been withdrawn pursuant to an AO OMK Governance Board Resolution.

3.1.3 Amendments to the Policy shall be made by AO OMK Governance Board resolution.

3.1.4 Revisions to an existing Policy may be initiated by any group of employees or a department in an OMK Group company. Drafts shall be submitted free form and shall show the previous and the new (proposed) wordings as well as the rationale for the change. An application shall be addressed to the labor relations and corporate social responsibility lead within the OMK Corporate HR Department (hereinafter, Labor Relations and CSR Function). Based on an application, the labor relations and CSR team shall hold discussions involving stakeholder representatives. The decisions to make or withhold changes and the new wordings shall be developed by a Corporate Social Responsibility Committee (hereinafter, CSR Committee).

3.1.5 A draft resolution to amend the current Policy shall be submitted to the Board by the Labor Relations and CSR Function.

3.1.6 Compliance with the Policy shall be monitored by the Corporate Social Responsibility Committee.

3.1.7 The lead labor relations and corporate social responsibility officer shall make sure that the Policy is kept current and updated.

3.2 Prevention of Policy Violations

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

3.2.2 The OMK Group’s procedures to respond to direct and indirect violations of this Policy shall be communicated to every employee.

3.2.3 Notices of potential violations shall be forwarded to the Labor Relations and CSR Function pursuant to the provisions prescribed by corporate procedures within OMK Group companies.

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

3.2.5 Policy compliance shall be an integral part of OMK Group employees’ contractual undertakings. Any violation of the principles or the provisions of this Policy may be regarded as a
breach of undertakings within a labor relationship or misconduct and may result in consequences prescribed by law, including disciplinary action and reimbursement of the relevant costs.

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

4 Terms and Definitions

This Policy uses the terms and definitions set forth in SP.12-390.3, Central Glossary of Terms and Definitions as used by the United Metallurgical Company as well as the following terms with the relevant definitions:

4.1 Global Reporting Initiative (GRI): The International Independent Organization for Standards which helps companies, governments, and other entities understand and report their effect on such issues as climate change, human rights, and corruption.

4.2 Industrial Safety: A series of interrelated measures designed to assure compliance with the requirements of health, industrial, transportation, environmental, and fire safety, the safety of the manufacturing processes, and wellness.

4.3 Volunteerism: Contributions from individuals in the form of donated labor to address social, cultural, economic, and environmental issues.

4.4 Interested Parties (Stakeholders): Groups who affect and/or could be affected significantly by an organization’s or a group’s activities, products, or services and associated performance. (AA1000SES Standard).

4.5 Committee for Corporate Social Responsibility (CSR Committee): An advisory body under the aegis of the AO OMK Governance Board Chair that considers matters related to the development of the corporate social responsibility system as prescribed by the United Metallurgical Company Corporate Constitution and the OMK Corporate Social Responsibility Policy.

4.6 Company (OMK Group, OMK): A collection of legal entities, including the "United Metallurgical Company" Joint-Stock Company (OMK), each of its subsidiary entities as well as companies belonging to the AO OMK Group pursuant to the Federal Statute on Fair Competition Practices.

4.7 Compliance (Compliance System): A system of legal and managerial activities, rules, and procedures designed to make Company operations compliant with relevant requirements and prevent violations of said requirements in the areas of compliance selected by the Company.

4.8 Compliance Team: A group of Company employees offering functional support for the Compliance System. A compliance team is empaneled and nominated by a directive of the AO OMK Governance Board Chair, is accountable to the Chair in all its undertakings, and includes the chief compliance manager and compliance officers responsible for areas of compliance.

4.9 Consolidated Risk Map Relative to Significant CSR Components: A document containing a registry of risks for the entire OMK Group related to failure to comply with standards and requirements in corporate social responsibility.

4.10 Corporate Charity: A program of targeted social investment undertaken using Company funds and financial resources to reduce social and environmental tensions outside the
manufacturing sites. Corporate charity projects and programs have clear performance indicators monitored by Company executives.

4.11 **Corporate Social Responsibility (CSR):** Company responsibility for the societal and environmental impacts of its decisions and operations expressed in the form of ethical behaviors taking into consideration stakeholder expectations, compliant with applicable statutes, and integrated into organization-wide operations.

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

4.13 **OMK Dialog Program:** An OMK program for a dialog with stakeholders to keep their interests and opinions in mind for activity planning purposes.

4.14 **Processing Step:** In the metal industry, a step in the processing of metal that changes (any or all of) chemistry, physical and mechanical properties, or state of matter.

4.15 **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 the greatest importance to the OMK Group's stakeholders.

4.16 **Direct Complicity:** Deliberate facilitation of violations of statutes, moral ethical standards in conjunction with other entities.

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

4.18 **Significant CSR Components:** Items of equal importance both to the stakeholders and the Company for implementing Company strategy and social mission.

4.19 **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.
OMK Joint-Stock Company

OMK Corporate Social Responsibility Policy

PL.12-490.2

Revision 1

5.3 **Anti-Corruption Practices**

Zero tolerance for bribery, collusion, and other types of corruption. Systematic action against corruption as part of the compliance system.

5.4 **Human Rights**

5.4.1 Safeguarding human rights 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.

5.4.2 Rejection of any form of discrimination or forced labor.

5.4.3 Personnel industrial health and safety.

5.4.4 Development of collaboration among employees based on approved and employee-endorsed corporate values.

5.4.5 Safeguarding of the employees’ rights to freedom of association and trade-union membership.

5.4.6 Conditions in the workplace promoting employee personal and professional development.

5.4.7 Equal opportunity for all Company employees in full compliance with the applicable legal and contractual provisions.

5.4.8 Fair remuneration for employees based on accomplishments and experience.

5.5 **Environmental Protection**

5.5.1 Guaranteed reduction of negative impacts on the environment from production facilities, including: atmospheric air, land resources, landscapes, biodiversity, bodies of water.

5.5.2 Compliance with Russian Federation statutory environmental requirements and applicable international standards.

5.5.3 Implementation of the best available technology to improve environmental efficiency and reduce production resource intensity.

5.6 **Supply Chain**

Communication of responsible business practices down the supply chain by devolving the provisions of this Policy. Promotion of responsible supply chains and provision of information to consumers regarding OMK product impacts to society and the environment in all processing steps.

5.7 **Consumer Communication**

Respect for the rights of consumers to purchase and utilize products that bring no harm to their health or ecosystems. Assurance of free access for consumers to complete information regarding the properties of products offered.

5.8 **Care of Children**

Prohibition for the OMK Group, its contractors, and vendors against using labor that is not yet of a legal hiring age (child labor).

5.9 **Development of Operational Geographies**

5.9.1 The Group shall promote a high quality of life and social and economic development in communities in areas where the OMK Group does business.
5.9.2 Different forms of dialog and consultation through OMK’s various departments shall be used to assure transparency of information of importance to the local communities, including information on matters of significance to such communities.

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

6 Policy Implementation Activities

6.1 CSR Management System:

6.1.1 Committee on Corporate Social Responsibility:

a) The CSR Committee shall be empaneled to monitor implementation of this Policy's provisions and to integrate all the material CSR-related information within the OMK Group.

б) CSR committee membership, authority, and procedures shall be defined by a Corporate Social Responsibility Committee Charter.

в) The CSR Committee shall collaborate with other committees and working groups established within the Company to manage individual areas of OMK development that are of priority for the OMK Group’s corporate social responsibility.

г) The CSR Committee shall develop harmonized mechanisms to collect, consolidate, authenticate, and disclose information on CSR priorities and performance for the entire OMK Group, such as: human rights, product safety, anti-corruption measures, manufacturing safety, external social programs in areas of operation, communication with stakeholders (list is not necessarily exhaustive).

д) The CSR Committee shall approve target values for key performance indicators (KPIs) with respect to the CSR components defined in this policy and monitor that such indicators are achieved.

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

ж) The CSR Committee shall approve a single registry of CSR risks applicable to all the OMK Group companies. The severity and the probability associated with 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 system for risk assessment relative to individual CSR components, as needed.

з) The CSR committee shall procure the assessment of investment projects (major development or upgrade projects) for compliance with CSR statutes, regulations, and requirements.

и) The CSR Committee shall develop recommendations for management to prevent the making of decisions with elements of direct, beneficiary, or tacit complicity.

6.1.2 Organization Accountability for KPIs Related to Policy-Approved CSR Components.

а) Designated organizations shall keep track of indicators whereas the Labor Relations and CSR Team shall hold regular discussions (at least, once a year) regarding KPI completion with respect to the identified material CSR components and shall assure employee engagement in discussions of strategies to achieve such indicators.

б) Responsible organizations designated by the CSR Committee shall make sure that current versions of documents regarding key CSR components be available wherever they are utilized (manufacturing facilities and offices).
a) The designated organizations as defined by the CSR Committee shall be provisioned with specialized instrumentation and monitoring equipment to keep track of the KPIs related to significant CSR components.

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

6.1.3 Labor Relations and CSR Function

a) The labor relations and CSR team shall keep current the registry of industry standards and regulator requirements relative to the following key CSR components as applicable to OMK Group companies: manufacturing safety, human rights, social obligations to employees, and consumer rights.

b) The labor relations and CSR team shall monitor that the consolidated risk map related to identified CSR components stay current and draft summary reports on the significant risk probability trends for the CSR Committee.

6.1.4 OMK Group companies shall regularly assess the KPIs related to their impacts to the social condition of their operating geographies and the environment (including any contractor impacts). The outcomes of such assessments shall be submitted to the CSR Committee for deliberation.

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

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

6.1.7 The AO OMK Purchasing Directorate shall communicate this Policy to vendors and contractors.

6.1.8 The AO OMK Industrial Safety Directorate shall develop the Policy with respect to manufacturing safety and assure compliance. It shall develop the industrial safety management system, maintain the currency of regulations, and implement industrial safety improvement programs at OMK Group manufacturing facilities.

6.1.9 OMK Group Company HR Directorates (HR organizations) shall maintain the regulations and standards current and generally coordinate labor relations in matters of human rights, personnel development, maintaining a fair financial and non-financial incentive system, a balanced system of social guaranties and benefits.

6.1.10 OMK Group Company Sales Directorates (organizations engaged in sales) shall assure consumers free access to complete information regarding the properties of products being offered, the existing environmental restrictions, and recycling methods.

6.2 Stakeholder Communication

6.2.1 The labor relations and CSR team shall develop and maintain current a stakeholder listing and shall integrate each identified individual stakeholders' expectations regarding the OMK Group's actions (at least once a year).

6.2.2 The in-house audit function shall assure receipt and confidential processing of communications (including anonymous ones) at and by the OMK hotline regarding possible violation of rights. The OMK hotline availability will be assured by providing at least three avenues wherein communications can be received (telephone, regular mail, email).
6.2.3 The labor relations and CSR function shall manage activities in a manner to take stakeholder opinions into consideration by conducting qualitative and quantitative sociological research and providing feedback as to their outcomes under the OMK Dialog Program.

6.2.4 The corporate public relations directorate 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.

6.3 Anti-Corruption Practices

6.3.1 The labor relations and CSR function shall keep the Anti-Corruption Policy current and shall monitor the application of the policy.

6.3.2 The AO OMK corporate university shall regularly train employees on the current anti-corruption rules and practices and shall verify the knowledge acquired.

6.3.3 The AO OMK Security Directorate:

a) shall develop and keep current a functional safety strategy and the relevant procedures designed to prevent and identify instances of corruption within the OMK Group.

b) shall develop, implement, and keep current the information systems designed to identify potential employee conflicts of interest, employee vested interests, beneficiaries, evaluate possible risks and the amounts of actual and 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 the OMK Group.

6.3.5 The AO OMK Directorate for Government Relations and Corporate Social Responsibility shall develop and maintain current a Government Communication Procedure assuring that a single process be used within the OMK Group by employees to communicate with Government agencies in a legal and open manner taking care of OMK Group interests.

6.4 Human Rights

6.4.1 The labor 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 ban the use of corporeal punishment, psychological, physical, or verbal abuse.

6.4.2 The labor relations and CSR team shall undertake specialized studies (at least once a year) to uncover direct or indirect discrimination within the OMK Group labor force.

6.4.3 The AO OMK HR Directorate, the AO OMK Security Directorate, and the AO VSW Directorate for Information Technology shall keep current the employee personally identifiable information protection systems while the compliance team shall monitor compliance with the prescribed requirements.

6.4.4 The labor relations and CSR team shall guarantee the employees' right to follow their cultural traditions and customs that are legal and compatible with the manufacturing processes.

6.4.5 The OMK Group Company HR Directorates (HR organizations) shall monitor compliance with human rights regulations: eliminating discrimination, assuring equal opportunities for all employees, eliminating child labor, banning the use of corporeal punishment, psychological, physical, and verbal abuse.

6.4.6 The CSR Committee shall track trade union organization reports to monitor compliance with the standards established by collective agreements.
6.4.7 The OMK Ethics Committee as well as the OMK Group Company ethics committees shall investigate reports of violations of the corporate ethics standards set forth in the OMK Group Corporate Constitution and the Corporate Ethics Declaration.

6.4.8 Pursuant to the Russian Federation labor statutes, the Company shall nominate delegates to labor dispute committees to be empaneled by OMK Group companies and shall support the activities of such committees organizationally and technically.

6.5 Environmental Protection

6.5.1 The AO OMK Production Safety Directorate:
   a) shall procure the development and the implementation tracking of a program to improve the environmental efficiency of the Company’s production activities;
   b) shall track and analyze the level of impact that Company activities have on the environment and the relevant trends;
   a) shall develop, implement, and maintain the Company environmental management system abreast of the best practices;
   r) shall organize environmental monitoring of compliance with the requirements of environmental statutes.

6.6 Vendor and Contractor Communication

6.6.1 The AO OMK Procurement Directorate shall employ its best efforts to transmit to suppliers guidelines designed to assure compliance with this Policy.

6.6.2 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 companies and sustainable development objectives to the greatest possible degree.

6.6.3 Vendor and contractor CSR undertakings may be documented:
   – in delivery, work, and service contract annexes containing guidelines regarding working conditions, health and safety, anti-corruption, the use of child and forced labor as well as compliance provisions with respect to working conditions, industrial and fire safety, and environmental protection.
   – in vendor and contractor corporate regulations and procedures.

6.7 Consumer Communication

6.7.1 OMK Group company organizations involved in developing new technologies and products/services shall consider possible risks to consumers and the environment posed by the innovations.

6.7.2 OMK Group 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.

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

6.7.4 The CSR Committee shall make sure that the overall OMK Group product line development strategy should give priority to making products with a socially or environmentally advanced life cycle and a redeeming effect on society and the environment.
6.7.5 In the event it should become known, by analyzing publications in the media, among other things, that there have been human rights violations while OMK product was being used, the CSR Committee shall initiate an investigation to ascertain the facts and make a determination as to the proper response.

6.8 Care for Children

6.8.1 OMK Group company economic security directorates (economic security organizations) shall prevent children from finding their way into areas that present an increased health or life hazard with the exception of organized tours.

6.8.2 The AO OMK Procurement Directorate shall terminate contracts with suppliers and contractors regarding which there is verified intelligence that they use child labor.

6.9 Development of Operational Geographies

6.9.1 The OMK Group corporate charity foundations and the Directorate for Government Relations and Corporate Social Responsibility in collaboration with the Public Relations Corporate Directorate shall develop mechanisms and hold regular consultations with representatives of different local community groups in the operational geographies when identifying social priorities and community development initiatives. The outcomes of such consultations shall be put forward for discussion in the CSR Committee when the thrusts for external social programs are identified.

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

6.9.3 OMK Group companies shall develop, keep current, and implement action plans to manage the facilities’ environmental components.

6.9.4 The OMK Group corporate charity foundations in collaboration with the Directorate for Government Relations and Corporate Social Responsibility shall use mechanisms that will help wean society off support from charities.

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

6.9.6 The AO OMK Directorate for Manufacturing Safety shall develop a program and the criteria for a healthy lifestyle and monitor healthy lifestyle indicators in labor teams while the AO OMK Corporate Communication Directorate shall develop and implement a plan to publicize the activities for promoting a healthy lifestyle within the company.

7. Reference Standards and Associated Documents

<table>
<thead>
<tr>
<th>Standard</th>
<th>Description</th>
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<tbody>
<tr>
<td>AA1000SES</td>
<td>Stakeholder Engagement Planning: an international standard for stakeholder engagement planning, implementation, and quality assessment</td>
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<tr>
<td>GSSB (GRI)</td>
<td>Global Sustainability Standards Board: an international standard of corporate sustainability information disclosure.</td>
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SA 8000:2014
The international standard of social responsibility is designed to make sure that employees enjoy benign working conditions, to monitor human rights compliance in the workplace as well as other matters of a social nature, including remuneration.

GOST R ISO 26000

KH.12-100.3
United Metallurgical Company Corporate Constitution

M.12-35.2
Risk Assessment and Ranking Procedure

M.12-52.1
Vendor, Supplier, and Contractor Qualification Procedure

P.12-545.1
Manufacturing Safety Committee Charter

P.12-100.1
Corporate Social Responsibility Committee Charter;

P.12-20.2
Policy on Sponsorship and Charity in the United Metallurgical Company;

P.12-42.20
United Metallurgical Company Ethics Committee;

P.12-20.5
Charter for the OMK Partnership Competition for Charity and Social Initiatives;

P.12-42.16
United Metallurgical Company Social Council Charter;

P.12-133.8
Policy Regarding the Security of Personally Identifiable Information During Processing;

P.12-110.3
United Metallurgical Company Corporate Compliance Team Policy;

P.12-110.5
United Metallurgical Company Hotline Policy;

PL.12-12.2
United Metallurgical Company Production Safety Policy;

PL.12-21.3
Corporate Policy for Managing External Social Programs;

PL.12-100.17
Anti-Corruption Policy;

PL.12-110.4
United Metallurgical Company Corporate Compliance Policy;

P.12-49.1
Government Relations Regulation;

CTK.12-22.3
Corporate Standard on Key Components of a System to Manage Industrial Health and Safety системы управления охраной труда, промышленной безопасностью и Manufacturing Process Safety

Corporate Ethics Declaration within OMK Group;

OMK Group company collective agreements with employees;

Functional Safety Strategy.
<table>
<thead>
<tr>
<th>Revision Number</th>
<th>Sections and Annexes Affected</th>
<th>Approval Directive Reference and Date</th>
<th>Effective Date</th>
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<td>0</td>
<td>Replaces Policy ПЛ.12-20.6, ОMK Corporate Social Responsibility, Revision 0, approved by АО ОMK Board Resolution No. 12008-Пр-12/17/1 of March 13, 2017. Changes introduced in Sections 1.1.1, 1.4.6, 2.2, 2.4.1, 2.4.2, 4.2, 4.4, 4.7, 5.3, 5.4.3, 5.5.1, 5.5.2, 5.5.3, 5.8, 6.2.2, 6.2.3, 6.3.1, 6.3.2, 6.3.4, 6.4.3, 6.4.7, 6.4.8, 6.5.1, 6.6.1, 6.6.3, 6.8.2, 6.9.1, 6.9.3, 6.9.4, 7</td>
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