

Approved
by ZAO OMK Board of Directors,
Minutes No. 41/2011 of June 30, 2012

**OMK GROUP
PRIVACY AND
PERSONAL INFORMATION SECURITY POLICY**

Moscow, 2012

1. GENERAL PROVISIONS

To protect the Group's business reputation and to assure compliance with Federal legal standards, OMK Group management believes that it is most important to assure proper handling of personal information as part of the Group companies' business processes and to provide the requisite level of security for any personal data being processed.

When setting up to process and processing personal data, OMK Group companies shall follow the requirements of Federal Statute No. 152-Φ3 of July 27, 2006 on Personal Data and the legal standards devolving therefrom (hereinafter, Russian Body of Law on Personal Information Handling and Security).

2. PERSONAL DATA PROCESSING PRINCIPLES

Personal information is processed legally and fairly, and such processing is limited to the accomplishment of specific predefined and legal objectives. The only personal information to be handled is that which meets processing objectives. The content and the volume of the personal data processed by the Group shall meet the publicized processing objectives; no superfluous data shall be handled.

Any processed personal information shall be accurate, sufficient, and relevant to the objectives of having personal information processed, as required. OMK Group companies shall take (procure the taking of) the appropriate steps to delete or update inaccurate or incomplete personal information.

Personal data shall be stored in a format that enables the identification of the person concerned no longer than is required by the processing objectives unless storage duration for the personal information is defined by a federal statute or a contract to which the person concerned is a party, a beneficiary, or a guarantor. Once the processing objectives are accomplished or the need to accomplish such processing objectives has been overtaken by events,

the personal information is to be destroyed or depersonalized unless otherwise specified in a Federal statute.

3. PERSONAL INFORMATION PROCESSING OBJECTIVES

In furtherance of the principles governing the processing of personal information, the OMK Group has defined the following objectives for processing personally identifiable information:

- review of resumes and selection of candidates to fill potential vacancies within the Group;
- discharge of undertakings specified in employment agreements;
- compliance with the requirements of the Russian Federation Labor Code as well as other national standards;
- provision of health insurance to employees;
- entering into contracts with counterparties and performance thereunder;
- holding of OMK Group company shareholder meetings;
- issuing of Company access passes.

4. PERSONAL INFORMATION PROCESSING RULES

The OMK Group does not process special or biometric personal information, and does not release personal information across national borders.

Entities making up the OMK Group may provide personal information to other entities and/or charge such entities with the processing of personal information with the consent of the owner of such personal information unless otherwise specified in Federal statutes. At the same time, an undertaking by a party to maintain the confidentiality of personal information and its security as it is being processed shall be a pre-requisite for providing such personal information to other entities and/or charging such other entities with the processing of such personal information.

5. IMPLEMENTED PERSONAL INFORMATION PROTECTION REQUIREMENTS

Realizing the importance of and the need for safeguarding personal information, OMK Group management encourages continuous improvement in personal information protection systems.

**OMK Group Privacy and Personal Information Security
Policy**

The following safeguards have been put in place to assure the security of personal information as it is being processed:

- individuals have been appointed and charged with managing the processing and assuring the security of personal information;

- local policies have been published regarding the processing of personal information as well as local policies establishing procedures designed to prevent and identify violations of Russian statutes;

- an assessment has been completed to gauge the damage that may be incurred by owners of the personal information, and threats to the security of such personal information have been identified.

- organizational and technical safeguards have been put in place, including the use of data security tools, detection of unauthorized access, recovery of personal information, personal information access rules as well as monitoring and evaluations of the effectiveness of the measures in place;

- employees directly involved in the processing of personal information have been made familiar with the provisions of Russian statutes pertaining to the processing and security of personal information.