

# Code

Of Business  
Conduct



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# Code of Business Conduct

As adopted by the Board of Directors  
on April 25, 2007

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This Code of Business Conduct embodies the fundamental principles which Evraz Group S.A. (“Evraz”), its subsidiaries (combined with Evraz, the “Group”), and their employees and stakeholders seek to uphold. Being a guiding statement of principle, this Code does not in any way alter the obligations or rights of Evraz, any member of the Group, or any of the Group’s employees, and is not designed to be relied upon by third parties.

## 1. CORPORATE RESPONSIBILITY

### 1.1 ADHERENCE TO ESTABLISHED SETS OF PRINCIPLES

Evraz is strongly committed to corporate responsibility, and this is evident in its compliance with the highest standards of business conduct and ethics. As its operations transcend international borders, Evraz utilises the OECD Guidelines for Multinational Enterprises to ensure as uniform an approach as possible to high business standards at all times, within the constraints of the markets in which it operates. Evraz strives to uphold widely recognised principles of human rights and fully endorses the provisions of the Universal Declaration of Human Rights, especially those which are relevant to it as a corporate entity. Finally, Evraz is fully committed to fair dealing, and is proud to take a strong stance against corruption in all forms. Consequently, Evraz wholly endorses the relevant provisions of:

- the UN Global Compact;
- the UN Convention against Corruption;
- the OECD Convention on Combating Bribery of Foreign Public Officials in International Business Transactions; and
- the EU Convention on the Fight against Corruption involving Officials of the European Communities or Officials of Member States.

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## 1.2 COMPLIANCE WITH LAWS AND REGULATIONS

Evraz operates universally with respect for the rule of law. Every effort is made without compromise to ensure compliance with all applicable international, national and local laws and regulations, regardless of jurisdiction.

## 1.3 ACCURACY OF RECORDS

Evraz understands that accountability and transparency depend upon effective record keeping. In turn, effective record keeping enables the development of effective systems and controls. Policies and procedures are in place at every level of the Group which ensure effective record keeping in all aspects of the Group's operations, including wholly accurate and transparent financial statements, permitting full compliance with all applicable laws and regulations. Records are made available to directors, the Evraz Group S.A. Audit Committee, the Group's internal audit function and the Group's external auditors. Further, Group policy ensures the security and integrity of the records which are kept.

## 1.4 PROTECTION AND PROPER USE OF COMPANY ASSETS

Inappropriate use of Group property harms the operation of the Group to the detriment of all of its stakeholders, from employees to shareholders. Every individual within the group is responsible for ensuring that the Group's property is safe from theft or damage. Use of the Group's property must be solely in accordance with applicable policy, and unauthorised or inappropriate use of Group property will be dealt with accordingly.

Evraz actively encourages and supports innovation, but intangible property (such as know-how, patents, software or other intellectual property) created in connection with the Group's business remains

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the property of the Group. Consequently, employees may not profit from or claim intellectual property rights in respect of such intangible property created in the course of their employment.

### 1.5 CONFIDENTIAL INFORMATION

All confidential documents and other information pertaining to the Group and its operations are the property of Evraz. They must be not be misused for individual or third party purposes and must be protected from theft, and may be used for the purposes of Evraz alone.

Confidential information about Evraz includes, but is not limited to, sales, earnings and balance sheet figures and projections, business plans and budgets, and information about possible acquisitions, disposals or other significant transactions. Such information may only be disclosed to persons outside the Group where:

- the information is required to be disclosed by law, regulation or court order;
- the information is already widely available publicly; or
- the information is needed by that person for the proper purposes of their business relationship with Evraz.

Information relating to our customers, suppliers and other business partners remains subject to the same guidelines, unless a specific agreement with the relevant third party permits the disclosure by Evraz of its information.

All information requests from the press, media or other third parties with whom Evraz does not already have a business relationship should be discussed with the Vice-President for Corporate Affairs and Investor Relations. Further, if any employee is in any doubt about how to deal with information relating to Evraz or third parties, the matter should be discussed with the Vice-President for Corporate Affairs and Investor Relations.

#### 1.6 USAGE OF E-MAIL AND INTERNET

The IT systems used by the Group, including email and internet systems, are the property of the Group. They must be used primarily for work-related purposes, and otherwise solely in accordance with the Group's IT policy. Use of the IT systems for any illegal or immoral purpose or for the harassment of fellow employees will not be tolerated.

Evraz respects the privacy of its employees, and provides them with password-protected access to the Group's IT services. Nonetheless, in order to monitor compliance with the Group's IT policy, Evraz reserves the right, subject to applicable law, to access the email accounts and internet systems of employees from time to time.

#### 1.7 PERSONAL INFORMATION

Evraz respects the personal information of its employees. The Group supports and complies with all applicable legislation and regulations which protect personal data where such rules exist, but further aims to apply the highest standards of protection in this area across all of its operations. Information enabling the identification of individuals must only be used for proper business related purposes.

#### 1.8 CONFLICTS OF INTEREST AND CORPORATE OPPORTUNITIES

Evraz is supportive of the interests of its employees, especially where they benefit the community at large. Nonetheless, each individual has a responsibility to avoid situations where personal interests could conflict with those of the Group. Employees of the Group must avoid external interests, whether business, financial or otherwise, which could have a negative impact on their work for the Group (such as where an external interest results in a lack of time or attention to tasks, or unduly influences an employee's judgement when making decisions relating to the Group). Attempting to influence decisions made about the Group for personal benefit is, without exception, entirely unacceptable.

Opportunities properly belonging to the Group which are identified by its employees are not to be exploited for personal gain and must be shared with colleagues for the benefit of the Group as a whole.

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### 1.9 WHISTLE-BLOWING

All individuals within the Group are responsible for ensuring not only their own compliance with the Group's policies, but the compliance of their colleagues as well. All breaches of Group policy should be reported without delay to the appropriate supervisor. All reports will be treated seriously and confidentially, and will be investigated under the appropriate procedure.

Evraz will not tolerate recriminations against individuals who have, in good faith, reported breaches of any of its policies.

### 1.10 UNIVERSAL PARTICIPATION OF EVERYONE AT ALL LEVELS IN THE GROUP

The principles, policies and procedures set out in this Code of Business Conduct and its related documents have been approved by the board of directors of Evraz and personally endorsed by the Chief Executive Officer. These principles, policies and procedures apply to each and every individual within the Group, without exception.

## 2. SUSTAINABLE DEVELOPMENT

### GENERAL PRINCIPLES OF SUSTAINABLE DEVELOPMENT

#### 2.1 ECONOMIC, SOCIAL AND ENVIRONMENTAL ISSUES

Evraz understands that its business activities are capable of having a significant effect on the areas in which it operates, both on people and on the local and ultimately global environment. Evraz's goal is to ensure that this effect is as beneficial as possible. Evraz believes that it can be a positive force in the lives of those around it, and that through good stewardship and innovative industrial practices, it can help to safeguard the planet for future generations.

Underlying efforts in this area is the belief that respect for the wellbeing of people and places impacted by the Group's operations is not inconsistent with the pursuit of a profitable enterprise. Rather, the Group believes that the implementation of sound financial, environmental, social, health and safety and quality management policies will ensure enhanced profitability and future success. Consequently, Evraz is com-

mitted to the encouragement of innovation throughout the Group in order to continue to enhance the quality of its products and the efficiency of its manufacturing processes. In the pursuit of these aims, Evraz is pleased to endorse the principles of the International Council on Mining and Metals Sustainable Development Framework.

## 2.2 COMMITMENT OF RESOURCES TO SOCIAL INVESTMENT

Evraz remains highly committed to its social investment programmes, which are reviewed by the board of directors on an annual basis. These policies are designed to ensure that Evraz contributes in a direct and meaningful way to the local community in areas where it operates. Evraz knows that actions speak louder than words, but many of the tangible steps which the Group takes to protect the environment and improve the wellbeing of its people are not immediately obvious to local communities, though these communities will ultimately benefit from such measures. Evraz's continuing commitment to social investment aims to redress this balance in perception, and strives to demonstrate the Group's respect and value for the communities in its areas of operation.

## SPECIFIC PRINCIPLES DESIGNED TO ENSURE SUSTAINABLE DEVELOPMENT

### 2.3 RESPECT FOR THE ENVIRONMENT AND THE PREVENTION OF ENVIRONMENTAL DAMAGE

Evraz uses best endeavours to comply with all environmental laws and regulations applicable in all the territories in which it operates. The Group is acutely aware of the possible environmental impact of its production processes and energy consumption. Accordingly, the Group has set a number of goals in this field, which are as follows:

- to continuously monitor its environmental impact at all levels, from individual smelters to the global environment;
- to eliminate environmental incidents to zero; and
- to operate processes which make the most efficient use of natural resources and energy possible.

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Evraz believes that working towards these goals goes hand in hand with improving the profitability of the group.

#### 2.4 PROVISIONS FOR HEALTH AND SAFETY AND THE PREVENTION OF ACCIDENTS

Evraz considers the health and safety of its employees to be paramount. The Group constantly looks for ways in which the health and safety of its workforce may be improved, and is committed to complying with all applicable health and safety laws and regulations. Evraz makes every effort to conduct regular inspections in order to eliminate dangerous conditions or behaviour along with their causes, and to develop programmes dedicated to improving our safety and wellbeing. All employees are encouraged to report the slightest risk and to suggest ways in which their jobs could be made safer.

Even where all applicable legal and regulatory requirements are satisfied, health and safety can always be improved and Evraz's ultimate goal is to have zero accidents across the entire Group every year. In pursuing this goal, Evraz sets specific objectives for its production facilities, and always strives to find new ways to reduce risk. One of Evraz's priorities in this area is to ensure a uniform approach across the entire Group by implementing a globally recognised health and safety standard in each subsidiary and each plant.

The possession, sale or use of alcoholic beverages, stimulants or narcotics of any kind is entirely inconsistent with the principles of health and safety in the workplace. Consequently, it is not tolerated by Evraz on any of its premises.

#### 2.5 QUALITY ASSURANCE

Evraz is committed to meeting and exceeding its customers' expectations. To this end, Evraz continually monitors its processes and systems in order to ensure the highest levels of customer satisfaction. Evraz believes that meaningful dialogue with clients across all

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stages of the production process is the key to securing its objectives in this area, and welcomes all feedback from clients on any aspect of any services and products provided.

Since the quality of Evraz's products, production processes and services is a central element of its approach to sustainable development, the Group's quality management policy is integral to its business plan. Evraz aims for quality to be a main priority of all employees involved in the production and services processes.

## 2.6 DEVELOPMENT OF NEW PRODUCTS, SERVICES AND PRODUCTION TECHNIQUES

In line with its support of innovation, Evraz encourages a pioneering approach to the development of new products, services and production processes in order to improve the overall quality of its products. The Group constantly assesses areas in which it can improve, and conducts regular quality reviews. A robust policy on investigating complaints is in place to harmonise the way in which complaints are dealt with and to translate complaints into solutions.

## **3. RELATIONS WITH BUSINESS PARTNERS AND STAKEHOLDERS**

### 3.1 SHAREHOLDERS AND THE STOCK MARKET

Evraz firmly believes that investors in its securities should be fully informed about all material information pertaining to the Company and the Group.

As a company with securities listed on the London Stock Exchange, Evraz is committed to meeting its market disclosure obligations, and making other necessary public filings, promptly and fully. Evraz regularly assesses the systems and procedures in place to ensure that information material to investors in the Company's securities is reported through the appropriate internal channels and disseminated to the market.

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To protect the orderly functioning of the market in Evraz securities, and to ensure compliance with applicable insider trading and market abuse laws, the Company has adopted a mandatory policy governing trading in Evraz securities by employees of the Group and other persons with access to price-sensitive inside information.

### 3.2 RELATIONS WITH EMPLOYEES

The Group endeavours to ensure that all of its employees enjoy fair treatment and equality of opportunity in a work environment free from discrimination and harassment.

Evraz is committed to the development of expertise and know-how by every employee of the Group. Evraz aims for its employees to receive regular training, assessment and appraisals, with the goal that each of its employees will become an expert in his or her field.

Evraz has a strict policy banning child labour throughout the Group.

### 3.3 FAIR TRADING

Evraz is committed to the highest standards of fair dealing and honesty when dealing with customers and suppliers, and expects similar commitments from those with whom it conducts business.

In particular, the Company is committed to compliance with the relevant provisions of the OECD Guidelines for Multinational Enterprises even in areas where national laws or regulations do not impose similar requirements. In doing so, Evraz always remains mindful of the practical constraints of the markets in which it operates.

### 3.4 SUPPLIERS

Evraz chooses its suppliers based on objective criteria, and aims to treat all of its suppliers fairly and honestly. It aims to put supply contracts out for tender, where possible, and expects its suppliers to aim to uphold the same standards of business conduct as Evraz.

In its dealings with its suppliers and customers, Evraz upholds the confidentiality of sensitive third party information, and complies with all procurement regulations and other related regulations in the jurisdictions where it operates.

### 3.5 CUSTOMER RELATIONS

Evraz's success derives from the quality of its products and the continued business of its customers. Consequently, Evraz treats its customers with integrity and fairness and strives to achieve the complete satisfaction of its customers. Information provided to customers should be honest, and promises made to its customers should be kept.

### 3.6 COMPETITION AND ANTITRUST

Evraz is keenly aware of the regulatory environment in which it operates and aims to comply with the antitrust and competition laws of the jurisdictions in which it undertakes business. As a business, Evraz believes that free-market competition leads to higher customer satisfaction founded on better value, higher quality, products.

The Company does not engage in collusive behaviour and does not enter into anticompetitive agreements with competitors. Evraz also regularly reminds its staff that confidential information should not be shared with competitors, nor conduct engaged in that could lead to any suspicion of price-fixing or other outlawed behaviour.

### 3.7 INTELLECTUAL PROPERTY / USE OF BRANDS BY THIRD PARTIES

Evraz prides itself on its history and reputation. Evraz strives to promote and protect its brand as one of its most valuable assets for which no compromise should be made.

### 3.8 MEDIA

In accordance with its obligations as a listed company, Evraz disseminates all material information regarding its business to the market.

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In its general dealings with the media, Evraz maintains a policy of honesty and openness. Only senior staff with media responsibilities are permitted to represent the views of and communicate developments regarding the Company to the media.

Evraz only believes in and undertakes positive marketing initiatives.

### 3.9 GOVERNMENTAL RELATIONS AND POLITICS

Evraz does not engage in bribery or corruption and complies with all anti-corruption laws and regulations in all jurisdictions where it operates, including the U.S. Foreign Corrupt Practices Act, which it is subject to worldwide. Evraz prohibits payment to government officials (or employees of state-owned enterprises) by its staff or otherwise on its behalf for the purpose of influencing any act or decision for the benefit of the Group and its interests at large.

Evraz does not proactively support a particular political organization and does not sponsor or provide funding to any political parties. Evraz requires its employees who run for any political position to notify their political activities to the Company to ensure that no conflict of interest arises.

[WWW.EVRAZ.COM](http://WWW.EVRAZ.COM)