

## **HUMAN RIGHTS POLICY**

of EVRAZ plc

as adopted by the Board of Directors on 16 April 2020

EVRAZ plc and its affiliates (collectively, "EVRAZ", "the Group", "the Company") is a large metals and mining business with production facilities in the Russian Federation, the USA, Canada, the Czech Republic and Kazakhstan. As one of the main employers in the regions where we operate, the Group greatly values people and endeavours to create a working environment where our employees, business partners, local communities and other stakeholders can fully realise their potential.

### **Scope**

EVRAZ Human Rights Policy (hereinafter – "the Policy") is to be applied to our relationships with our relevant stakeholders, including all directors, officers and employees, as well as business partners, local communities and other stakeholders. No one in EVRAZ may be exempted from the duty to comply with this Policy. Where the laws and regulations of the countries in which we operate differ from our Policy, we apply any higher standard in place respecting human rights.

### **Purpose and Commitment**

The purpose of the Policy is to outline our commitment to recognize and respect fundamental rights and freedoms granted to all people in line with the recommendations provided in the following documents and standards:

- The Universal Declaration of Human Rights;
- The International Covenant on Civil and Political Rights;
- The International Covenant on Economic, Social and Cultural Rights;
- The International Labour Organisation's Declaration on Fundamental Principles and Rights at Work;
- The United Nations Declaration on the Rights of Indigenous Peoples;
- The United Nations Guiding Principles on Business and Human Rights.

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## Core Principles

In addition to the principles of the Policy, which has been developed in line with the recommendations set forth by the aforementioned standards, we have formulated other policies which include respect for human rights, as follows: Business Conduct Policy, Anti-Corruption policy, Data Privacy Policy, Social Investments Guidelines, Health, Safety and Environmental policy. This Policy should be considered in conjunction with the policies listed above, any other EVRAZ policy and applicable laws and regulations and should be applied with a consistent approach.

### Commitment to stakeholders:

Employees: We reaffirm our respect for the human rights of all our employees, including the freedom of expression, association and collective bargaining. Respect for people and ensuring equal rights and opportunities is a key success principle for EVRAZ. To accomplish this, the Company has created competitive working conditions, a commitment to fair pay and working hours, it guarantees to pay appropriate social security contributions and the protection of employees' rights. The Company follows the principles of equality, diversity and non-discrimination in its operational activities.

Business partners: We respect and promote human rights when maintaining relationships with vendors, suppliers, contractors and other third parties that provide the Company with services or products, which can affect the financial performance, revenue or reputation of EVRAZ. The Company provides equal opportunities to potential vendors, suppliers and contractors requiring, however, that they operate strictly within the law, act with the highest standards of health and industrial safety; minimize any negative impact on the environment; and respect the rights of their employees and the local community.

Local communities: We strive for respectful, transparent and constructive cooperation with local communities, which constitute an integral part of EVRAZ activities and development. Creating shared value and respecting the human rights, views and traditions of people in our regions of operation are among the Company's core principles. EVRAZ will avoid the involuntary displacement of families and communities. Where this is not possible EVRAZ will apply a suitable mitigation plan and implement actions that address adverse effects and restore or improve standards of living of displaced people.

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## Our approach

The cornerstone of this Policy lies in the idea that all people are born free and equal in dignity and rights, regardless of their race, colour, sex, language, religion, political or other opinion, national or social origin, property, birth or other status.

EVRAZ guarantees that each employee can expect:


- An open and constructive discussion of the results of their work with a supervisor;
- Support in the development of their competencies and skills;
- Recognition and financial reward based on the performance of the company and the individual;
- Being treated with respect and provided with equal opportunity;
- Having the safest working conditions possible at all its enterprises.

EVRAZ does not tolerate any form of child labour, bonded labour, human trafficking and other forms of slavery (known as “modern slavery”) which are strictly prohibited at all EVRAZ subsidiaries and by their suppliers. We are committed to acting ethically and to require that our suppliers carry out their business within the same ethical framework. We conduct risk assessments to determine which parts of our business and which of our suppliers and subcontractors are at risk of breach of human rights. We engage with our suppliers regarding human rights issues and to understand better the steps they have taken to prevent breach of human rights in their businesses. We will also perform due diligence throughout the lifecycle of our own operations to determine whether a remedial action is required.

## Implementation

The implementation of the Policy is on the responsibility of our managerial and operational functions. To promote and ensure compliance with our commitments, EVRAZ’s staff should:

- strictly observe this Policy while operating with one another inside the Group as well as with any counterparties from external business relationships;
- develop and maintain a business free from discrimination, where every employee has the opportunity to contribute to our overall results and to realize their abilities and potential;

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- know and comply with all applicable laws and regulations related to human rights;
  - be proactive in protecting human rights and freedoms;
  - immediately report the abuse to a supervisor, if found out any violation of the rules and requirements of this Policy.

We will develop and implement training on this Policy for our key employees and business partners, and report on our progress to the Board of Directors.


### **Reporting and remediation principles**

To prevent and minimize the risks of a breach of human rights, we have created a confidential and round-the-clock hotline through which anyone can report their concerns about any kind of breaches in EVRAZ or our suppliers. We will protect employees who raise their concerns in good faith, even if they turn out to be mistaken. We are committed to ensuring no employee suffers any adverse treatment as a result of reporting in good faith his or her concerns or suspicions of discrimination or harassment taking place in our business or in any of our supply chains.

Any claims or allegations made which are found to be malicious or vexatious will result in disciplinary action being taken against the employee.

The Group operates two separate confidential whistleblowing lines:

- The Corporate Whistleblowing line in Russia and Kazakhstan:
  - email [vopros@evraz.com](mailto:vopros@evraz.com)
  - toll-free number: 8-800-555-88-88 (Russia), 8-800-080-43-58 (Kazakhstan)
  - internal corporate portal: <https://portal.evraz.com/hotline/SitePages/Hotline.aspx>
- The EVRAZ North America whistleblowing line:
  - email [hotline@evraz.com](mailto:hotline@evraz.com)
  - toll-free number: 866-334-1777
  - internal corporate portal: <https://secure.ethicspoint.com/domain/media/en/gui/56482/index.html>

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## **Our governance and monitoring**

EVRAZ's senior executives will regularly monitor and review the effectiveness and efficiency of this Policy and report to the Board of Directors. All senior officials of the Group will demonstrate in practice their personal commitment to human rights, ethical behavior and compliance with this Policy.

### **Review**

The Policy is to be reviewed on a regular basis and, if needed, may be amended at any time to reflect developments in business or changes to international or local regulations, if any.