NLMK Group
Human Rights Policy

Responsible leadership is inconceivable without respect for human rights

VISION

NLMK Group as a socially responsible company does not tolerate any violation of human rights in its operations, including stakeholder relations

MISSION

The Company addresses its social mission through accomplishing sustainable development goals that meet the long-term economic interests of businesses in terms of social welfare, respect for human rights and improving the quality of life in its areas of presence

GOALS

- **Ensure the observance of human rights throughout NLMK Group operations across the entire territory of its presence**
- **Globally serve as an example of a business that contributes to the social development of communities while observing and respecting human rights**

PRINCIPLES

- Observing and respecting human rights as defined by the Russian legislation and international legal acts, including: supporting the right to freedom of assembly and association, the right to personal liberty and privacy, compliance with the prohibition of child labor, the ban on forced labor, non-discrimination rule, adhering to occupational health and safety principles, ensuring safe working conditions, observing the right to a guaranteed minimum salary
- Preventing risks of human rights violations
- Equal Policy requirements to all the stakeholders
- Transparency and availability of information on the respect for human rights across NLMK Group

ACTIONS

- Comply with international and Russian legal requirements and standards on human rights
- Communicate the Human Rights Policy to all stakeholders, including employees, contractors and business partners
- Ensure continuous improvement of knowledge and competence of employees in the human rights area

MANAGEMENT COMMITMENT

- **Formulate the principles and goals of the Human Rights Policy and follow up on their performance**
- **Take immediate action whenever human rights violations are identified**
- **Conduct a regular assessment of the compliance of its activities with the principles of this Policy**
- **Publish information on human rights observance in the Company's annual report**
- **Update this Policy and related documents as necessary**

EMPLOYEE COMMITMENT

- **Fully abide by the human rights principles in discharging their functions**
- **Know and understand NLMK's Human Rights Policy**

The policy has been developed in accordance with the current guidelines as set out in the following documents:

- The International Bill of Human Rights;
- The main conventions of the International Labour Organization (No. 29 “Forced or Compulsory Labour”, No. 87 “ Freedom of Association and Protection of the Right to Organise”, No. 98 “Right to Organise and Collective Bargaining”, No. 100 “Equal Remuneration”, No. 105 "Abolition of Forced Labour", No. 111 "Discrimination (Employment and Occupation)", No. 138 "Minimum Age", No. 182 "Worst Forms of Child Labour");
- The UN Guiding Principles on Business and Human Rights
- United Nations Global Compact principles;
- Transforming our World: the 2030 Agenda for Sustainable Development (UN);
- Russian Federation Legislation.

CEO
(Chairman of the Management Board)

Grigory Fedorishin

Enacted by Order of CEO (Chairman of the Management Board) No. 1092 dd. December 29, 2018.
This Policy supplements the requirements of the Company's governing documents:
NLMK Group's Code of Conduct and Anti-Corruption Policy