

PARTNER CODE

OF BUSINESS CONDUCT

Policy LG-162-0009-2022



➤ PURPOSE

NLMK Group (hereinafter – NLMK) strives to maintain the highest standards in compliance and corporate ethics. We believe that compliance with applicable legal requirements and corporate ethics is a precondition for sustainable results.

The actions of NLMK suppliers/contractors (hereinafter – the “Partners”) can have a significant impact on the Company's operations and reputation, and this is why we expect our Partners to comply with legal requirements and corporate ethics in the same way we do. This Code was developed with the best international practices in mind. The observance of standards of conduct set forth herein is a prerequisite for cooperation with NLMK. Any misconduct related to violation of the requirements established in this Code shall be deemed as sufficient grounds for revising the Partner's qualification status and/or termination of contractual relationship with such Partner.

➤ EQUAL REQUIREMENTS FOR ALL PARTNERS

- 2.1. All NLMK's operations are grounded on compliance with the requirements contained in applicable laws, including antitrust laws. To ensure fair and equal treatment of all participants in the procurement procedures, we establish uniform requirements and do our best to prevent unreasonable limitations to the procurement competition.
- 2.2. Each Partner, in their turn, is obligated to comply with the procurement participation rules adopted by NLMK and make sure to act ethically and in good faith.
- 2.3 The procurement participants may not exchange information on prices and any other conditions that may affect the selection of the winner or take any actions that may restrict competition.

➤ ANTI-CORRUPTION PRINCIPLES

- 3.1. In keeping with our zero-tolerance approach to corruption, all NLMK Partners are strictly prohibited from participating, directly or indirectly (through third parties), in any actions in the interests of NLMK and/or at the expense of NLMK or in relation to NLMK which in line with the applicable laws, may be qualified as bribery, corrupt business practices, as well as any other actions made in violation of applicable anti-corruption legislation, including offering, giving or promising to provide any financial or other benefits or advantages with the intent to induce any person (including a public official or employee of a commercial organization) to diverge from proper performance of their official duties in the interests of the person offering such benefits or advantages or another person they represent, including any violations of the order and procedures established by applicable laws.
- 3.2. Should any information regarding a possible (or potential) violation by a Partner of the above anti-corruption requirements become known to NLMK, the Company reserves the right to request explanations from the Partner, as well as all information and documents that may relate to the uncovered situation.
- 3.3. Should any violation of the provisions set forth in Clause 3.1 of this Code be confirmed and/or should the Partner fail to provide the explanations/information/documents mentioned in Clause 3.2 hereof, the Company is entitled to unilaterally terminate relevant agreement with the Partner without resorting to litigation by sending written notice no later than 14 (Fourteen) calendar days in advance, as well as to take measures to disqualify the Partner.

- 3.4. If a Partner (a Partner's employee) should become aware of a violation committed by an NLMK employee and/or an employee of another NLMK Partner, as set forth in Clause 3.1 of this article, they must report it to the Compliance Department by using one of the channels specified in Section 14 hereof.
- 3.5. Since all Russian organizations are obligated to take anti-corruption measures stipulated in Article 13.3 of Federal Law No. 273-FZ "On Corruption Counteraction" dated December 25, 2008, NLMK requires compliance from all Partners and is entitled to request relevant documents to confirm such compliance, and the Partner, in their turn, undertakes to immediately make them available. The list of mandatory measures includes:
- Designating units or officials responsible for the prevention of corruption and other violations.
 - Developing and implementing standards and procedures to ensure business integrity.
 - Adopting a code of ethics and official conduct for employees.
 - Preventing and resolving conflicts of interest.
 - Preventing unofficial reporting and the use of forged documents.

➤ IDENTIFYING CONFLICTS OF INTEREST

NLMK adheres to strict rules in the identification, disclosure, and settlement of conflicts of interest. A conflict of interest arises when an employee's vested interest affects or may affect the decisions made in their official capacity. If a Partner (a Partner's employee) should become aware of such vested interest of an NLMK employee, they must report it to the Compliance Department by using one of the channels specified in Section 14 of this Code.

➤ BUSINESS GIFTS AND BUSINESS HOSPITALITY

- 5.1. Business gifts and business hospitality (including entertainment expenses) are a part of the generally accepted business practices aimed at promoting sustainable business relationships. At the same time, NLMK Group views business hospitality as an area associated with high corruption risks and, therefore, deems it necessary to set certain requirements for permissible business gifts and tokens of business hospitality as stipulated in the Anti-Corruption Policy and other documents available on the NLMK website (Compliance section).
- 5.2. NLMK employees may not request, demand or force NLMK business partners and other third parties to give them or related persons any business gifts and/or tokens of business hospitality.
- 5.3. By default, in the course of procurement procedures, the participants, their employees or related persons may not offer business gifts and/or tokens of business hospitality to the organizers, their employees and/or any other persons involved in decision-making under these procedures.
- 5.4. NLMK prohibits business gifts in the form of cash or non-cash money, securities, precious metals, gift certificates and other cash equivalents and/or luxury goods.
- 5.5. If a Partner (a Partner's employee) should become aware of any violation of the above rules by an NLMK employee, they must report it to the Compliance Department by using one of the channels specified in Section 14 of this Code.

> HUMAN RIGHTS AT THE WORKPLACE

As part of its special commitment to human rights at the workplace, NLMK seeks to ensure respectful, comfortable and safe working conditions for all employees.

NLMK expects Partners to respect human rights established by international legal acts and agreements (including those adopted by the International Labour Organization), as well as all laws that may apply in the Partner's jurisdiction. This includes supporting the freedom of assembly and association and the right to liberty and personal security, prohibiting forced labour and child labour, human trafficking and discrimination based on gender, social status, religion or race, ensuring safe working conditions, labour and health protection and respecting the right to a guaranteed minimum wage as stipulated in applicable laws/jurisdiction.

> COMPLIANCE

NLMK pays special attention to the quality of its products, which, in turn, may largely depend on the quality of purchased materials/services. All goods/services purchased by NLMK must meet the requirements to quality, health and life safety, sanitary standards, other safety requirements, government standards and/or certification requirements if such requirements are stipulated by the contract and/or laws that apply to a given type of goods/services.

> COUNTERING THE MISUSE OF INSIDER INFORMATION AND MARKET MANIPULATION

NLMK implements strict restrictions on access to its insider information and uses a system of measures to comply with the requirements stipulated in Federal Law No. 224-FZ "On Countering the Misuse of Insider Information and Market Manipulation and on Amendments to Certain Legislative Acts of the Russian Federation" dated July 27, 2010. If a Partner needs access to the NLMK's insider information to perform their contractual obligations, such Partner shall be included in the NLMK's list of insiders.

The list of materials classified as insider information is available at



<https://nlmk.com/ru/about/governance/insider/>.

> PERSONAL DATA

The Company implements special measures to protect personal data during processing. Whenever NLMK needs to transfer personal data to a Partner as per a relevant contract, the supplier/contractor undertakes to comply with all requirements set forth in Federal Law No.152-FZ "On Personal Data" dated July 27, 2006 in the course of personal data processing, including ensuring its protection.

➤ COMPLIANCE WITH ENVIRONMENTAL REQUIREMENTS

NLMK maintains a special commitment to environmental protection and expects its partners and contractors to show the same attitude to environmental issues, in particular:

- Strive to minimize environmental impact, perform their work in an environmentally responsible and sustainable manner at all times and take measures to prevent or mitigate adverse environmental effects on nature and climate.
- Adopt an appropriate environmental management system, including an environmental policy.
- Comply with all applicable legislative requirements concerning environmental protection in the course of production / performance of works / provision of services / supply of goods to NLMK.
- Obtain the necessary permits for environmental protection and management of natural resources and comply with the established permits.
- Comply with the environmental protection requirements set out in NLMK's environmental documentation.
- Take care of the flora and fauna, preserve biodiversity in its sphere of influence, in particular, refrain from disturbing animal migration routes, hunting or fishing in the NLMK project implementation zones, refrain from destroying or damaging green spaces.
- Assess their greenhouse gas emission levels and climate impact.
- Ensure efficient use of resources, utilize energy-efficient technologies and make efforts to reduce climate impact.
- Strive to minimize the use and formation of highly hazardous substances and materials.
- Develop and ensure compliance with the procedures aimed at containment and prevention of emergencies, redress and eliminate environmental damage caused through their own fault, including any damage resulting from emergencies, take measures to prevent their recurrence.
- Work together with NLMK to optimize and improve the approaches to environmental protection with a focus on reducing the negative effects on water, air and soil, reducing carbon footprint and cutting down the consumption of water, energy and hazardous materials.
- Keep open the environmental information related to their business performance and contact details for environmental and climate issues..

➤ COMPLIANCE WITH OCCUPATIONAL HEALTH AND SAFETY REQUIREMENTS

NLMK maintains a special commitment to compliance with occupational health and safety requirements and expects its Partners to show the same attitude to OHS issues, in particular:

- Observe NLMK Cardinal Safety Rules.
- Meet the requirements of the NLMK occupational health and safety management system.
- Adopt their own occupation safety policy approved by the CEO.
- Manage OHS risks at all stages of service provision.
- Maintain continuous OHS control at all stages of production.
- Conduct regular audits and upgrade the OHS management system.
- Continuously improve staff knowledge and skills.
- Develop a safety culture by introducing new tools and best practices in OHS.
- Ensure the transparency and reliability of OHS information.
- Pay attention to OHS issues when managing subcontractors.

➤ CONFIDENTIALITY

NLMK expects that Partners will take all necessary measures to keep confidential all internal non-public information about NLMK which may become known to them solely as a result of conclusion and performance of a contract with the Company.

The Partners may only use such information to fulfil their relevant obligations to NLMK stipulated in contracts or elsewhere and may only disclose or provide it to third parties in one of the following cases:

- Subject to NLMK's prior written consent.
- When the Partner needs to comply with legal requirements or court order, subject to sending a prior notice to NLMK.

➤ PROTECTION OF INTELLECTUAL PROPERTY AND PUBLIC STATEMENTS

13.1. NLMK strives to adhere to the highest reputational standards in all areas of business and society and expects the same from its Partners.

Any public statements on behalf of NLMK or references to NLMK can only be made after obtaining written permission from the NLMK's authorized officials.

13.2. The Partner confirms and guarantees that it shall observe the property and non-property rights of NLMK and other entities pertaining to protected intellectual property and equivalent protected identity elements, including, but not limited to, the rights to works of science, literature and art, computer software, databases, performances, audio records, radio or television transmissions on the air or by cable (over-the-air and cable broadcasts), inventions, utility models, industrial prototypes, selective breeding results, integrated circuit topographies, trade names, trademarks and service brands, geographical indications, designations of origin, commercial designations, rights to systems used by NLMK, procedures, working methods and ways to perform professional activities, technologies and know-how (hereinafter – “Intellectual Property”).

The Partner undertakes to complete all steps (including national or international registration, whenever necessary) required to transfer to NLMK all exclusive rights to the Intellectual Property developed (created) by the Partner as part of the performance of any contract with NLMK.

➤ CONTACTS

If you have any questions about this Code, or if you become aware of any violations of the requirements set out in this Code or unfair/unethical conduct of an NLMK employee or an employee of any NLMK Partner, please contact the Compliance Department



by dialling (toll-free number)

8-800-234-35-03,



or sending an email to

compliance@nlmk.com,

or use any other contact method mentioned at **www.nlmk.com** (Compliance section).

Please contact the OHS hotline to report any violations of Occupational Health and Safety (OHS) requirements at



8-800-600-04-74



HSE@nlmk.com

