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Approved by the Board of Directors of PJSC Uralkali  
(Minutes No. 400 dated 26.11.2021)

## **The Human Rights Policy of PJSC Uralkali**

### **Purpose**

The Human Rights Policy of PJSC Uralkali (hereinafter, the Policy) was designed to create a proper environment for observance and protection of human rights and promotion of appropriate ethical norms and principles. This Policy serves to inform all interested parties of PJSC Uralkali's and its subsidiaries' (hereinafter together referred to as Uralkali or the Company) zero tolerance for any violations of human rights. The Policy declares the Company's commitment to human rights compliance in relation to all of its direct employees regardless of their position or status, to its suppliers and contractors, and also to local communities.

### **Regulatory framework**

By adopting this Policy, Uralkali hereby confirms that it fully supports the provisions of the Universal Declaration of Human Rights (adopted by the UN General Assembly on 10 December 1948) and is aware of its responsibility to observe human rights in its activities to the necessary and possible degree.

In addition to the Universal Declaration of Human Rights, which is the primary document on this matter, the Company also abides by other international regulations including the United Nations Guiding Principles on Business and Human Rights (2011). According to these principles, businesses have a responsibility to uphold and protect all of the internationally recognised rights that are understood as those indicated in the International Bill of Human Rights, including the International Covenant on Civil and Political Rights and the International Covenant on Economic, Social and Cultural Rights, as well as the principles of the International Labour Organisation Declaration on Fundamental Principles and Rights at Work, including the following:

- freedom of association and the effective recognition of the right to collective bargaining;
- the elimination of all forms of forced or compulsory labour, human trafficking and other forms of slavery;
- the effective prohibition of child labour;
- the elimination of discrimination in respect of employment and occupation.

Uralkali agrees with the indicated principles and recognizes its responsibility for upholding and protecting human rights in its activities.

### **Observation of employee rights**

In its relationships with employees, and in strict compliance with applicable laws, the Company undertakes to:

- uphold and protect human rights and demonstrate its commitment to the principles of this Policy starting from the top management of the Company – managers at all levels are obliged to comply with the requirements of this Policy and openly declare the importance of human rights protection thus acting as an example for their subordinates; they are also committed to preventing any violations of human rights by using all methods available to them;
- respect human dignity and not permit any form of discrimination in relation to any person based on race, gender, age, religion, nationality, social status or other characteristics not related to their professional qualities or individual performance results;
- support cultural diversity in the Company;

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- provide equal remuneration for equal-value work based on an impartial assessment of different duties without discrimination for any characteristics not related to their professional qualities or qualification.

Uralkali, being a large company, which employs thousands of people, makes provisions for protection and observance of human rights in its internal documents including in the Code of Corporate Culture, which details the overall mission, vision, and future development prospects of the Company. The Code also contains a description of the common values, principles, standards and rules of conduct and interaction that apply to all Uralkali employees.

Uralkali will also be informing and training its employees on the principles of appropriate conduct and human rights requirements in order to enhance their awareness of these matters and to improve the culture of interaction within the Company. The Company expects all of its employees to strictly abide by the principles set forth in this Policy.

The Company provides all stakeholders with equal opportunities to submit possible complaints or enquiries concerning violations of human rights or business ethics via anonymous feedback mechanism like the Ethics Officers or the Call Centre. The Company guarantees confidentiality and anonymity as well as the absence of sanctions or negative consequences for anyone who has submitted such a complaint or enquiry. It also undertakes to take all necessary actions to eliminate any proven violations.

The following communication channels are available:

- direct federal telephone number: +7-800-200-24-99
- direct internal telephone number: 6-24-99, 02
- by e-mail at [call-center@uralkali.com](mailto:call-center@uralkali.com);
- using a special feedback form on Uralkali's official website at [www.uralkali.com](http://www.uralkali.com);
- using a special feedback form on Uralkali's intranet portal at [portal.uralkali.com](http://portal.uralkali.com).

### **Observation of the rights of local communities**

In its relationships with local communities in the countries and regions of Uralkali's presence, the Company undertakes to:

- respect the rights, culture and customs of local communities including indigenous minorities;
- implement all possible measures to eliminate any negative consequences for human rights, including the rights of local communities, if a violation took place.

The Company also undertakes to operate in full compliance with the applicable laws and on the basis of the required permits (licences), where necessary, including the use of land and other natural resources while striving to minimise any negative impact on these resources.

### **Commitment to safety principles**

Uralkali supports the Voluntary Principles on Security and Human Rights and takes all necessary action to implement and maintain a safety system, which fully conforms to the requirements of the applicable laws and is based on a comprehensive assessment of risks including those pertaining to occupational and industrial health and safety, as well as on recognition and respect of such rights.

Accordingly, the Company undertakes to:

- implement measures that ensure the safety of the Company and its employees and that make it impossible to violate human rights including through improper or excessive utilisation of special equipment and tools;
- ensure the safety and well-being of all employees and create a positive working environment.

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### **Relationships with business partners**

In its relationships with business partners (i.e. with suppliers, contractors, customers and other counterparties), the Company:

- takes all possible actions to uphold high standards of human rights and business ethics, including zero tolerance for corruption, and applies the same standards when selecting counterparties;
- maintains a continuous and open dialogue with all stakeholders and takes their interests into consideration in its activities;

The Company aims to liaise with those counterparties, which observe human rights principles and are aware of this Policy. During the contractual process, the Company informs its counterparties about the principles stated herein in order to make sure that our counterparties share and respect these principles.

### **Implementation, monitoring and reporting**

Pursuant to this Policy, the Company undertakes to ensure that all of its policies and procedures comply with the principles of this Policy.

The Company understands the importance of identifying, analysing and assessing human rights risks and strives to integrate all necessary control procedures in its risk management system in order to prevent such risks and to develop corresponding mitigation measures if a risk could not be prevented.

Uralkali regularly monitors matters related to human rights. A report on compliance with the principles of this Policy shall be submitted to the Sustainable Development Committee and the Board of Directors of the Company at least once a year in order to ensure effectiveness and constant improvement of the human rights practices in the Company. The responsibility for preparing such report lies with the HR and Communications Directorate of Uralkali.

As part of Uralkali's performance management system, compliance with the principles of this Policy will be taken into account when assessing the performance and achievements of the Company and certain employees as indicated in the relevant internal document of Uralkali.

Information about the implementation of this Policy shall be included in the Company's sustainability reports.

This Policy is published on the corporate website of the Company at [www.uralkali.com](http://www.uralkali.com) and is available to all interested parties.