

Approved by a resolution of the Board of
Directors of PJSC Uralkali

(Minutes No. 406 dated 11 May 2022)

Anti-Corruption Policy of PJSC Uralkali

Edition 3

Moscow

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Foreword

1. This document was developed by the Internal Audit Directorate of PJSC Uralkali.

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1. Scope and purpose

This Anti-Corruption Policy (hereinafter, the **Policy**) is a set of interrelated principles, procedures and specific measures aiming to prevent and neutralise potential corruption offenses in PJSC Uralkali (hereinafter, the **Company** or **Uralkali**). The Policy applies to all employees of the Company regardless of their position (including members of the Company's governance and financial control bodies), as well as to third parties acting for and/or on behalf of the Company and entities of Uralkali Group (including under a power of attorney, an agreement or otherwise). The Policy is recommended for implementation by all entities of Uralkali Group (subject to applicable legal requirements) and for observance by counterparties of the Company.

This Policy has been developed with a view to:

- create a proper environment for compliance with anti-corruption legislation and for promotion of ethical norms and principles, and to minimise the risk of corruption in the Company;
- inform all interested parties about the Company's zero tolerance to any kind of illegal actions, including corruption and fraud, about anti-corruption legislation and the principles of Uralkali's anti-corruption compliance system;
- arrange interaction, which is compliant with anti-corruption requirements, of the Company's employees with third parties in the course of financial and economic activities of the Company.

The requirements of anti-corruption legislation, this Policy and other internal regulatory documents must be unconditionally and strictly observed by all employees of the Company, regardless of their position, length of service, status and other relationships with the Company.

The Company expects its employees to comply with this Policy and share the Company's values as set out in the Code of Corporate Culture.

Since October 2014, Uralkali has been a member of the Anti-Corruption Charter of the Russian Business, which demonstrates the Company's support of the anti-corruption initiative and commitment to the key principles of the Charter.

2. Regulatory framework

This Policy is based on the following regulatory documents:

- The Russian Constitution;
- The Russian Criminal Code dated 13 June 1996 No. 63-FZ;
- The Russian Administrative Code dated 30 December 2001 No. 195-FZ;
- Federal Law dated 25 December 2008 No. 273-FZ "On countering corruption";
- The Russian Labour Code dated 30 December 2001 No. 197-FZ;
- Decree of the Russian President dated 13 April 2010 No. 460 "On the National Anti-Corruption Strategy and the National Anti-Corruption Plan for 2010-2011";
- Decree of the Russian President dated 13 March 2012 No. 297 "On the National Anti-Corruption Plan for 2012-2013 and amendments to certain corruption-related decrees of the Russian President";
- Guidelines by the Russian Ministry of Labour and Social Protection dated 8 November 2013 "On the development and adoption of measures by organisations to prevent and combat corruption".

For best practice purposes, this Policy was developed using the experience of other countries that apply high requirements and standards in countering corruption and fraud, in particular, the UK Bribery Act

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2010, in force since 1 July 2011, and the US Foreign Corrupt Practices Act (FCPA), in force since 19 December 1977.

The Policy contains references to the following internal regulations of Uralkali:

- The Code of Corporate Culture;
- The Risk Management and Internal Control Policy;
- The Standard of Procurement Activities;
- The Disciplinary Action Regulations;
- The Conflict of Interest Regulations;
- The Anti-Corruption Awareness Regulations;
- The Call-Centre Regulations;
- The Hospitality expenses Regulations;
- The Business Gifts Regulations;
- The Charity and Sponsorship Regulations;
- The Recruitment Regulations;
- The Counterparty and Contract Review Regulations.

3. Terms and definitions

The following terms and definitions are used in this Policy:

- **Anti-corruption legislation:** laws and regulations adopted in the Russian Federation regarding fraud, corruption and respective liability.
- **Anti-corruption compliance system:** a complex of elements of corporate culture, organisational structure, rules and procedures set by internal regulations aimed at ensuring anti-corruption compliance of all employees regardless of their position.
- **Close relative:** a close family member of a Company's employee, namely: spouse, parents, children, adoptive parents, adopted children, brothers, sisters, grandfathers, grandmothers, and grandchildren.
- **Uralkali Group:** PJSC Uralkali and its subsidiaries. The composition of Uralkali Group shall reflect the actual subsidiary structure of Uralkali.
- **Stakeholders:** individuals or legal entities interested in the Company's financial and other performance and capable of influencing the Company by virtue of their actions, opinions and decisions. The stakeholders include employees, shareholders, investors, counterparties, suppliers, buyers, state and municipal authorities, non-governmental organisations, mass media etc.
- **Conflict of interests:** a situation that creates a possibility for an employee to acquire a material or another benefit for themselves personally, for close relatives or friends to the detriment of the Company's or the Group's commercial, corporate or other interests. A conflict between representatives of the Company's different subdivisions or production facilities does not constitute a conflict of interests.
- **Compliance manager:** an employee of the Company in charge of supporting the risk and internal control management system in terms of compliance with legal requirements, including methodological and practical support of internal controls of the corporate anti-corruption compliance system. The Company may have several compliance managers; or the compliance manager's role may be distributed among several employees. The exact number of compliance managers has to suit legal requirements to the respective functions in the organisation.

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- **Corruption:** abuse of office, giving or taking a bribe, abuse of power, commercial bribery or any other misuse by an individual person of their position in breach of legitimate interests of the Company or the state, with the purpose of acquiring a benefit in the form of money, valuables, other property or material services or other property rights for themselves or third parties, or an illegal provision of such benefit to such person by other individuals. The above actions for the benefit or on behalf of a legal entity also constitute corruption.
- **Corruption offence:** any action or inaction, which has signs of corruptions and which invokes civil, disciplinary, administrative or criminal liability under the anti-corruption legislation.
- **Corruption risks:** risks of fraud and corruption.
- **Fraud:** misappropriation or acquisition of a right to the Company's property by means of deception or breach of trust, including deliberate acts or inaction aimed at distorting financial statements.
- **Employee:** an employee of Uralkali or another entity of Uralkali Group.

4. General provisions

The anti-corruption compliance system adopted by the Company was developed on the basis of and in accordance with applicable Russian and international anti-corruption laws.

The Company considers it important to follow the anti-corruption principles reflected in international legislation applicable in the jurisdictions in which the Company and/or Uralkali Group entities may have a presence and/or operate, including the U.S. Foreign Corrupt Practices Act, to the extent applicable to Uralkali Group entities registered in the USA.

The Policy establishes the principles of the anti-corruption system and outlines the main elements of the anti-corruption compliance system. It also describes responsibilities of the Company's subdivisions and officers to ensure the implementation of anti-corruption activities.

The Company publishes the main principles of this Policy on its website, openly declares its rejection of corruption, requires compliance with this Policy from employees and other persons for whom the requirements of the Policy are obligatory as specified in Section 1 above, and welcomes compliance with the principles and requirements of this Policy by all counterparties and other persons. The Company seeks to minimise corruption risks by all reasonable and legal means.

5. Basic principles of the Uralkali's anti-corruption compliance system

5.1. *Tone at the top*

Managers at all levels invariably comply with this Policy and the anti-corruption legislation, openly declare their rejection of corruption, thus setting an example for their subordinates, and also seek to prevent corrupt acts by all available methods.

5.2. *Regular and timely risk assessment*

The Company regularly re-assesses corruption risks in order to monitor business corruption and fraud prone processes and to take appropriate risk minimisation measures.

Corruption risks are re-assessed annually as part of the general risk assessment procedure conducted by the Risk Department of the Internal Audit Directorate in line with the best international practices in risk identification and assessment.

Following the re-assessment, the Internal Audit Directorate develops recommendations on control measures to reduce the risks.

5.3. *Appropriate procedures*

The Company has appropriate procedures in place developed in accordance with applicable laws and generally accepted standards and aiming to minimise corruption risks. The activities of the Company

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and Uralkali Group entities are conducted strictly in accordance with applicable laws. The procedures adopted by Uralkali match the size of the Company and the level of the corruption risk; they are pragmatic, accessible to all employees and are implemented in an efficient manner.

This Policy identifies the Company's subdivisions and officers responsible for implementing (or ensuring implementation of) specific anti-corruption measures and provides them with necessary authority. Additional powers may be provided by other internal regulatory documents of the Company.

The responsibility to provide organisational and methodological support of the anti-corruption compliance system lies with the Head of Internal Audit.

The responsibility to provide practical and methodological support for the anti-corruption compliance system is assigned to a compliance manager or to another person authorised by the Head of Internal Audit.

5.4. *Due care*

Before a decision is made to commence or continue business relations, or when hiring new talents or acquiring interest in legal entities, or when interacting with counterparties and other interested stakeholders, the Company checks their reliability, the absence of conflicts of interest, any relationships with public officials, and analyses their reputation.

Background checks of potential employees, including against this Policy, are carried out by the Security Directorate and the HR Directorate in accordance with Uralkali's Recruitment Regulations.

The procedure of and criteria for checking counterparties, partners, shareholders of a joint venture and charity / sponsorship beneficiaries are described in the Counterparty and Contract Review Regulations. Before establishing business relations with new counterparties, the Company conducts their reliability check, which covers:

- business reputation of potential counterparties, their directors, shareholders and beneficial owners;
- their readiness to comply with the requirements of this Policy;
- their readiness to include anti-corruption clauses in contracts with the Company.

5.5. *Information and awareness-raising*

The Company informs all stakeholders about the requirements of this Policy.

In order to create an appropriate level of corporate culture, all new managers and employees involved in corruption-prone processes are given an induction training about the provisions of this Policy and related documents. Also, regular awareness workshops, held physically or online, are held for employees.

Employee training may take physical or online format. Communication channels include this Policy (which is publicly available on the Company's website), articles in the Company's corporate newsletter, information stands, corporate radio and television.

Employees of the Company and Russian entities of Uralkali Group, the list of which is determined by a compliance manager based on the results of the annual re-assessment of fraud and corruption risks, sign a statement of compliance with this Policy on an annual basis, as prescribed by the Company's internal documents.

Anti-corruption training is provided in accordance with the Employee Anti-Corruption Training Regulations.

5.6. *Continuous control and regular monitoring*

The Company regularly monitors and controls compliance by all employees of the Company with the requirements of this Policy and applicable anti-corruption legislation. The Company is constantly

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improving its internal control system, focusing on activities prone to fraud and corruption risk. If a materialised corruption risk is discovered, information about violations of the anti-corruption compliance system is provided to the subdivision responsible for this area of anti-corruption work.

The responsible subdivision of the Company, as indicated in the table of anti-corruption responsibilities in Appendix 1 to this Policy, regularly monitors changes in the Russian and applicable foreign anti-corruption laws, and also monitors initiation of corruption investigations by competent authorities. The internal documents of the Company are subject to change in the event of significant amendments to the current legislation.

If employees are in doubt about the anti-corruption compliance of their actions, they should seek advice from a compliance manager.

5.7. Non-retaliation

The Company guarantees that no sanctions like dismissal, demotion, cancelling of bonuses etc. will be imposed on employees who refused to commit any illegal action including corruption, even if such refusal means that the Company did not receive additional tangible and intangible benefits or incurred losses that could have been avoided only by violating laws or this Policy.

The Company considers unacceptable and seeks to promptly identify and stop retaliation within the organisation against employees who in good faith report alleged corrupt acts by another employee or other person, even if the allegations have not been confirmed.

This Policy is a key link in the system of promoting ethical norms and principles in the Company. It aims to create relationships with colleagues and external stakeholders that are based on honesty and trust, and to avoid actions that could damage the reputation of the Company and its stakeholders.

5.8. Responsibility and inevitability of punishment

The Company makes every possible reasonable and legal effort to promptly and unavoidably hold offenders liable for acts of corruption and other violations of the anti-corruption legislation and the Company's internal corruption-related regulations irrespective of the extent and form of such violations.

Information about disciplinary and other measures for violation of this Policy is communicated, among other channels, by posting information on the Company's internal network resource.

The Company reserves the right to make public information about persons held liable for corruption.

5.9. Business openness

The Company informs its counterparties, partners and employees about the anti-corruption standards of running business. The Company respects and protects the interests of its employees within its competence and within the limits established by applicable law. The Company maintains a professional environment that allows employees to perform their duties openly, in good faith and without prejudice.

6. Main elements of Uralkali's anti-corruption compliance system

6.1. Stakeholder relations

The Company fights all forms of corruption. To this end, the Company has put in place an anti-fraud and anti-corruption programme and also encourages employees to report corrupt / fraudulent activities via the Call Centre service:

- By e-mail: hotline@uralkali.com ;
- By phone: +7 800 200 24 99; +7 34253 6 24 99.

The Company sets high standards for the quality of the goods, works and services it acquires, the reliability of its partners and contractors and their compliance not only with applicable laws but also with the general rules of the business community including intolerance of discrimination and corruption.

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The Company includes an anti-corruption clause in contracts with counterparties.

When the Company becomes a member of legal entities or associations of legal entities, the Company:

- informs them about the principles and requirements of this Policy;
- promotes the adoption of policies or amendments to the internal regulatory documents of such entities, which are similar to this Policy in terms of anti-corruption compliance.

All employees, especially managers, are aware that they represent the Company, and their behaviour towards external partners and third parties affects the reputation of the Company. When establishing business relations with counterparties, the Company checks the reliability of counterparties.

6.2. Disclosure to stakeholders

In order to assure information availability to all stakeholders, the Company performs financial, tax and management accounting in compliance with applicable laws and internal regulations.

All transactions are reflected in the accounting and other books based on the principles of completeness, accuracy and transparency.

The Company does not allow any transactions without their reflection in the accounting records, it also does not allow any distortion or fabrication of accounting, management or other data or supporting documents.

All the Company's transactions are exercised with due diligence and require an approval by authorised persons in compliance with internal regulations.

6.3. Making hospitality expenses and gifts in accordance with the requirements

Receiving or giving of gifts and demonstrating hospitality indicates respect and politeness, helps building trustful business relationships but provided such gifts do not contradict the principles and requirements of this Policy, the Company's Code of Corporate Culture and applicable laws of the Russian Federation, aim solely to give a business gift, comply with business practices, do not create a reputational risk for the Company, do not represent a hidden reward, do not imply any obligations to the giver, are not intended to influence decision-making and do not give other persons a reason to perceive such influence. More detailed requirements for giving and receiving gifts are set out in the Business Gift Regulations.

If in an employee's opinion, receiving a gift resulted in expectations by a contractor or third party of obtaining unreasonable benefits, the person shall inform their immediate manager.

When dealing with representatives of state and municipal authorities, it is strictly required to observe regulations regarding grounds and procedure for giving of gifts and providing other kinds of remuneration.

All gift-associated and hospitality expenses must be correctly and properly accounted for in the expense reports.

Receiving and giving of gifts must be compliant with the Business Gift Regulations.

Hospitality expenses are regulated by the Hospitality expenses Regulations.

6.4. Prohibition of illegal remuneration including facilitation payments

Employees of the Company are strictly prohibited from:

- directly or indirectly, personally or through mediation of third parties, participating in corrupt acts;
- offering, giving, promising, requesting or receiving illegal remuneration;
- making payments not directly permitted by applicable laws to simplify administrative, bureaucratic or other formalities in any form.

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If an employee or person acting on behalf of the Company suspects that an illegal payment is requested from them, they must immediately inform their superior and/or a compliance manager.

6.5. Participation in charity and sponsorship

The Company does not participate in charity and sponsorship projects with a direct or indirect purpose of influencing decisions of employees of state and municipal authorities or other persons associated with the state or local and public authorities that affect the Company's activities.

Information on all expenses of the Company for the provision of charitable and sponsorship assistance is open.

Participation in charity and sponsorship activities is carried out in accordance with the Regulations on Charity and Sponsorship Activities of Uralkali.

6.6. Relations with authorities and the public

The Company considers it unacceptable to receive unreasonable commercial advantages by paying any expenses or providing any benefits or other property or non-property benefits for state or municipal employees, their close relatives (or in their interests), as well as other persons.

The Company does not participate in political activities with the direct or indirect purpose of influencing the adoption by state or municipal employees, or other persons associated with the state, local and public bodies of decisions that affect the activities of the Company or the Uralkali Group.

Information about the Company's expenses related to political activities is made publically available.

6.7. Relations with supervision and law enforcement bodies

Cooperation with supervision and law enforcement bodies is an important indicator of the Company's true commitment to the principles of this Policy.

Such cooperation make take various forms and must always be conformant to applicable laws, in particular, in the following aspects:

- reporting to law enforcement agencies about corruption offenses that became known to the Company or that were committed in the Company;
- assisting authorised representatives of supervision and law enforcement bodies during their corruption-related inspections of the Company's activities;
- assisting authorised representatives of law enforcement bodies during suppression or investigation of corruption crimes including criminal intelligence activities;
- refraining from interfering with the work of judicial or law enforcement bodies.

6.8. Conflicts of interest

In order to ensure a balance between the business goals of the Company and the private interests of employees, the Company applies a special procedure for disclosing information about and addressing conflicts of interest. This procedure is described in the Conflict of Interest Regulations.

The conflict of interest management aims to achieve the following objectives:

- Prevention of conflicts of interest;
- Mandatory disclosure of information about an actual or potential conflict of interest by employees and members of governance and financial control bodies of the Company;
- Consideration and assessment of reputational risks on a case-by-case basis upon identification and during settlement of a conflict of interest;
- Confidentiality of the process of disclosing information about a conflict of interest and its

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settlement, unless otherwise required by law;

- Respecting a balance of interests between the Company and the employee when addressing a conflict of interest;
- Protection of an employee from prosecution for reporting a conflict of interest, which was timely disclosed by the employee and resolved or prevented by the Company.

7. Obligations to ensure the implementation of anti-corruption measures

7.1. Distribution of roles

Taking into account the nature of the anti-corruption measures taken by the Company, the roles for ensuring anti-corruption measures in the Company are distributed as described in the table in Appendix 1 to this Policy.

7.2. Interaction during the implementation of anti-corruption actions

While ensuring the implementation of anti-corruption measures, a compliance manager may engage other necessary subdivisions, officers and employees of the Company who have relevant knowledge and skills to implement such measures.

The compliance manager has to constantly monitor and control the implementation of anti-corruption activities. Taking into account the nature of anti-corruption measures, the compliance manager may apply annual planning of such activities or set other conditions for monitoring and control, including but not limited to setting deadlines for updating and revising internal regulations and establishing a procedure for the Company's participation in audits and inspections.

8. Compliance and monitoring

The responsibility for compliance with this Policy lies with each employee of the Company regardless of their position. The Company welcomes all stakeholders of the Company to share the principles of the anti-corruption compliance system presented in this Policy.

Since the Company may be subject to sanctions for the involvement of Uralkali Group's employees, counterparties or production facilities and other persons in corrupt acts, internal investigations will be initiated for each reasonably suspected or confirmed act of corruption to the extent permitted by applicable law.

The procedure for responding to violations of this Policy is described in the Disciplinary Action Regulations.

9. Final provisions

The Policy comes into force once approved by Uralkali's Board of Directors and shall be valid indefinitely.

Entities of Uralkali Group are obliged to implement the main principles and provisions of this Policy by developing their own anti-corruption policies taking into account legal specifics of their host country, their internal organisational and legal structure and the provisions of other internal documents within one year from the date of this Policy.

Should an entity of Uralkali Group fail to adopt its own anti-corruption policy within this period, they shall be governed by this Policy to the extent it does not breach local legislation.

The responsibility for ensuring the implementation of this Policy rests with the Head of Internal Audit of Uralkali.

The Head of Internal Audit ensures that the general managers of Uralkali Group entities are informed about the approval of this Policy and any changes thereto so that the entities' local anti-corruption policies are kept accurate and up-to-date.

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The Head of Internal Audit together with the Head of Security ensure the development of an annual report on compliance with this Policy and on any identified violation, which shall be presented to the Audit Committee of the Board of Directors of Uralkali.

The Head of Internal Audit shall update this Policy from time to time.

Appendix 1

Distribution of roles for ensuring the implementation of anti-corruption measures in the Company

No.	Elements of the anti-corruption compliance system and anti-corruption measures	Responsible subdivisions
1.	<p>Development and implementation of appropriate procedures:</p> <ul style="list-style-type: none"> - development and submission for approval to the authorised bodies of the Company of draft internal regulatory documents and / or documents for public disclosure, which aim to implement measures to combat corruption and fraud; - development and implementation of measures to combat corporate fraud and corruption; - organisational and methodological support of the anti-corruption compliance system. 	Internal Audit Directorate
2.	<p>Stakeholder relations:</p> <ul style="list-style-type: none"> - counterparty checks; - informing counterparties about the Company's anti-corruption principles (including by including the anti-corruption clauses in contracts and agreements). 	Security Directorate; Legal and Corporate Affairs Directorate
3.	<p>Stakeholder disclosures:</p> <ul style="list-style-type: none"> - maintaining accounting, tax and management records in accordance with applicable law; - monitoring of compliance with applicable law when maintaining accounting, tax and management reports; - development of a report on the Company's anti-corruption activities for the disclosure of non-financial information of Uralkali. 	Finance Directorate Internal Audit Directorate
4.	<p>Hospitality expenses and gifts:</p> <ul style="list-style-type: none"> - monitoring of compliance with relevant internal regulatory documents the Business Gifts Regulations, the Hospitality expenses Regulations etc. 	Internal Audit Directorate Finance Directorate
5.	<p>Prohibition of illegal remuneration including facilitation payments</p> <ul style="list-style-type: none"> - monitoring of compliance with established regulations; - organisation of internal audits to identify and prevent corrupt and fraudulent actions of employees. 	Security Directorate
6.	<p>Participation in charity and sponsorship activities</p> <ul style="list-style-type: none"> - monitoring of compliance with the Charity and Sponsorship Regulations. 	HR Directorate
7.	Government and public relations	GR Department

	- monitoring of compliance with internal regulations of Uralkali.	
8.	<p>Relations with supervision and law enforcement bodies</p> <ul style="list-style-type: none"> - assisting authorised representatives of supervision and law enforcement bodies during their corruption-related inspections of the Company's activities; - assisting authorised representatives of law enforcement bodies during suppression or investigation of corruption crimes including criminal intelligence activities 	<p>Legal and Corporate Affairs Directorate</p> <p>GR Department</p> <p>Security Directorate</p>
9.	<p>Regular and timely risk assessment</p> <ul style="list-style-type: none"> - monitoring of key indicators risk of corruption and fraud risks; - comprehensive assessment of the fraud risk taking into account risk indicators, external and internal factors and the status corrective measures; - assessment of the Company's anti-corruption activities and development of reports on the existing corruption risk for the Company's management. 	Internal Audit Directorate
10.	<p>Conflicts of interest</p> <ul style="list-style-type: none"> - assistance with completion and consideration of conflict of interest statements; - collection of conflict of interest statements and declarations; - verification of information in employees' conflict of interest declarations; - advising employees on issues related to conflicts of interest; - convening a meeting of the Ethics Officers to address conflicts of interest, if necessary. 	<p>Internal Audit Directorate</p> <p>Security Directorate</p>
11.	<p>Information and training</p> <ul style="list-style-type: none"> - anti-corruption training and individual counselling for employees. 	<p>Internal Audit Directorate</p> <p>HR Directorate</p>
12.	<p>Call Centre</p> <ul style="list-style-type: none"> - handling and registration of messages received by the Call Centre; - forwarding of information to the Security Directorate for internal investigations; - development of an annual report on the Call Centre statistics. 	HR Directorate

Document history

Reference ID	Edition	Summary of changes
	Edition 1	Amendments to the Call Centre message handling procedure
P 03-2021	Edition 2	<p>The Company's legal form was changed. A table was added to show distribution of roles in anti-corruption compliance. The wording of the main anti-corruption principles was clarified, and new principles were added:</p> <ul style="list-style-type: none"> - responsibility and inevitability of punishment, - business openness, - non-retaliation. <p>New elements of the anti-corruption compliance system were added:</p> <ul style="list-style-type: none"> - prohibition of illegal remuneration including facilitation payments, - relations with supervision and law enforcement bodies, - management of conflicts of interest. <p>The definition of a compliance manager was updated.</p>