



# STAKEHOLDER ENGAGEMENT POLICY EN+ GROUP IPJSC



APPROVED

by the Board of Directors of

EN+ GROUP IPJSC

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## 1. Purpose and Application of this Policy

- 1.1. EN+ GROUP IPJSC (the “Company” and together with its subsidiaries other than UC Rusal, IPJSC and its subsidiaries, the “Group”) strives to use the capacity of its operations and the potential of its employees to support the transition to a low-carbon economy in line with the goal of limiting global temperature rise to 1.5°C above pre-industrial levels. The Group’s future relies on transition to low-carbon production and on the role that our aluminium plays in reducing the carbon footprint of the key industries, including construction, transport and light industries.
- 1.2. Ambitious goals are never achieved single-handedly – we need support from our partners. The Group’s strategy and success are built on engagement with our shareholders, market peers, employees, local communities, NGOs and authorities.
- 1.3. The Group strives to consider the interests and expectations of each stakeholder group. Mutually beneficial cooperation with key partners is foundational to a strong and sustainable business and is built on active dialogue and close interaction.
- 1.4. This stakeholder engagement policy (the “Policy”) sets out the Group’s goals, commitments and procedures for interaction with its stakeholders.
- 1.5. This Policy is binding on:
  - + All corporate governance bodies of the Group, including the Board of Directors and the Committees of the Board of Directors;
  - + All structural units of the Group.

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## 2. Goals of the Group in relations with its Stakeholders

### 2.1. Use every opportunity for mutually beneficial partnership

Few challenges can be solved single handedly. Whether it is internal collaboration or interaction with our partners, we seek solutions to challenges that no organization can solve on its own. The ambitious goal of transitioning to low-carbon economy is at the core of our strategy. We will be able to achieve this only by a joint effort to promote the use of lowcarbon resources and encourage a reduction in global carbon emissions. We are aware versatile approaches are necessary to address the climate crisis and should be welcomed from all sources, whether our own employees or external stakeholders. We therefore work continuously to find new opportunities for cooperation and new ways of contributing society through close interaction with all stakeholders of the Group.

### *2.2. Business success*

Our business success largely depends on our stakeholders, including governmental authorities and regulators, our employees and residents of the regions where we have operations. To be able to operate in the long-term, we must be respectful towards the views of local communities and build strong relations with our partners. Moreover, in cooperation with local communities and organizations we may shape the business environment in ways that help us build partnerships between the Group and our stakeholders to generate benefits for all parties.

### *2.3. Resolution of conflicts and disputes*

We acknowledge that stakeholders may have disagreements. By maintaining an effective dialogue with our stakeholders, we mitigate risks of conflicts and controversies. By analyzing the interests and expectations of our stakeholders, we can jointly prevent or control conflicts.

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## **3. Obligations of the Group regarding Stakeholder Engagement**

The Group understands its responsibility to its key partners and therefore commits to:

- 3.1. Timely delivery of reliable and accurate information regarding activities of the Group via communication channels convenient to our partners.
- 3.2. Strict compliance with international standards of transparency, including by means of financial, operational and sustainable development reporting.
- 3.3. Continuous improvement in understanding the needs and expectations of key partners through two-way communication.
- 3.4. Maintaining long-term constructive relationships with key stakeholders to be able to spot opportunities for mutually beneficial cooperation.
- 3.5. Guaranteeing the senior management of our Group will always be informed about the interests and opinions of our partners for decision making purposes.
- 3.6. Continuous analysis of the efficiency of our interaction so that the Group's action reflect our responsibility to our key partners.

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## 4. Procedure for Interaction with Stakeholders and Mechanisms for Management and Oversight

- 4.1. In interaction with stakeholders, the Group pays attention to the interests and expectations of each group of stakeholders and uses various tools so that interaction provides optimal results both for the stakeholders and the Group.
- 4.2. The Group has developed and deployed a strong stakeholder engagement management system, which provides constant feedback and ensures improvements in the way the Group interacts with its stakeholders.
- 4.3. Interaction with each stakeholder group is conducted by relevant departments of the Group to ensure that each group receives all necessary information on a regular basis in accordance with the Group's prescribed procedures.
- 4.4. Results of interaction with each stakeholder group are reported on a regular basis to the Group's top management and the Board of Directors.
- 4.5. Table 1 below shows the Group's procedure for interaction with its main stakeholder groups and mechanisms in place for management and oversight.

Table 1

## Procedure for Interaction between the Group and its Stakeholders

#	Stakeholder	Information / interests of stakeholders	Procedure / tools of interaction between the Group and its stakeholders	Group unit / frequency / oversight
1	<b>Shareholders and investors</b>	<ul style="list-style-type: none"> <li>+ Operating performance of the Group</li> <li>+ Short-term and long-term development strategy of the Group</li> <li>+ Dynamics of trading operations in the Group's securities</li> <li>+ Other information required for making decisions regarding trading operations in the Group's securities</li> </ul>	<ul style="list-style-type: none"> <li>+ Providing information upon request by investors, via various communication channels (email, phone, video conferences, meetings)</li> <li>+ Publication of mandatory periodic reports on various aspects of the Group's activity on the Company's website (Annual report, issuer's reports, sustainable development reports, etc.) in accordance with rules set by regulators and stock exchanges</li> <li>+ Mandatory information submissions by the Group as an issuer of securities</li> <li>+ Official press releases on various events or the Group's position on the Company's website</li> </ul>	<ul style="list-style-type: none"> <li>+ Capital Markets and Strategic Initiatives Department</li> <li>+ In line with reporting calendar and upon request</li> <li>+ Interaction reports to the Board of Directors</li> </ul>
2	<b>ESG rating agencies (RA)</b>	<ul style="list-style-type: none"> <li>+ Environmental programs and updates of the Group's environmental data: emissions, parameters of waste treatment, etc.</li> <li>+ Social programs of the Group</li> <li>+ Policies and procedures regarding Health, Safety and Environment; Human Rights; Corporate Governance</li> </ul>	<ul style="list-style-type: none"> <li>+ Providing information upon request by RA via various communication channels (email, phone, video conferences, meetings)</li> <li>+ Required disclosures via the Group's reports on the Company's website as requested by regulators and stock exchanges (Annual report, issuer's report; sustainable development reports, etc.)</li> <li>+ Official press releases on the Company's website</li> </ul>	<ul style="list-style-type: none"> <li>+ Capital Markets and Strategic Initiatives Department</li> <li>+ In line with reporting calendar and upon request</li> <li>+ Interaction reports to the Board of Directors</li> </ul>

#	Stakeholder	Information / interests of stakeholders	Procedure / tools of interaction between the Group and its stakeholders	Group unit / frequency / oversight
3	<b>Financial analysts (FA)</b>	<ul style="list-style-type: none"> <li>+ Information regarding the Group's share capital</li> <li>+ General market trends and their impact on the Group's activities</li> <li>+ Strategic objectives and areas of the Group's development</li> </ul>	<ul style="list-style-type: none"> <li>+ Providing information upon request by financial analysts, via various communication channels (email, phone, video conferences, meetings)</li> <li>+ Mandatory presentations to analysts and conference calls before disclosures of the Group's financial statements (quarterly, annual, etc.)</li> <li>+ Providing information to analysts regarding upcoming events or plans</li> </ul>	<ul style="list-style-type: none"> <li>+ Capital Markets and Strategic Initiatives Department</li> <li>+ In line with reporting calendar and upon request</li> <li>+ Interaction reports to the Board of Directors</li> </ul>
4	<b>International non-governmental organisations NGOs</b>	<ul style="list-style-type: none"> <li>+ The Group's impact on the environment and environmental indicators (greenhouse gas emissions, low-carbon aluminium output)</li> <li>+ Environmental protection measures in the regions where the Group has operations (incl. Lake Baikal and other natural sites)</li> </ul>	<ul style="list-style-type: none"> <li>+ Participation in relevant forums and conferences</li> <li>+ Hosting own relevant events</li> <li>+ Providing information upon request by NGO's, via various communication channels (email, phone, video conferences, meetings)</li> <li>+ Required disclosures via the Group's reports on the Company's website, if requested by regulators and stock exchanges (Annual report, issuer's report; sustainable development reports, etc.)</li> </ul>	<ul style="list-style-type: none"> <li>+ Sustainable Development Department</li> <li>+ In line with reporting and international conference calendar, as well as upon request</li> <li>+ Interaction reports to the Board of Directors</li> </ul>
5	<b>Aluminium associations and initiatives</b>	<p>The Group is a partner of:</p> <ol style="list-style-type: none"> <li>1. Aluminum for Climate Initiative (IAI)</li> <li>2. Aluminum Stewardship Initiative (ASI)</li> </ol> <p>Areas of cooperation:</p> <ul style="list-style-type: none"> <li>+ Enhancing transparency of technological processes in aluminum production</li> <li>+ Transitioning to production of low-carbon aluminium</li> <li>+ Raising demand for low-carbon aluminium</li> <li>+ Developing and deploying standards to reduce adverse impacts on the environment and to ensure responsible and open business practices</li> </ul>	<ul style="list-style-type: none"> <li>+ Participation in meetings of committees and task forces for aluminium initiatives, in which the Group is involved on a permanent basis</li> <li>+ Participation in meetings and discussions concerning plans and joint resolutions of the Group and aluminium initiatives via various communication channels (email, phone, video conferences, meetings)</li> </ul>	<ul style="list-style-type: none"> <li>+ Sustainable Development Department</li> <li>+ On a regular basis</li> </ul>

#	Stakeholder	Information / interests of stakeholders	Procedure / tools of interaction between the Group and its stakeholders	Group unit / frequency / oversight
6	<b>Energy associations</b>	<p>The Group is a ‘golden member’ of the International Hydropower (IHA) and the Global Sustainable Electricity Partnership (GSEP)</p> <p>Areas of cooperation:</p> <ul style="list-style-type: none"> <li>+ Sharing ideas and working on joint solutions for reliable, sustainable, competitive and efficient production of energy</li> <li>+ Promotion of renewable energy sources as a tool for reducing global carbon emissions</li> </ul>	<ul style="list-style-type: none"> <li>+ Participation in meetings and discussions concerning plans and joint resolutions of the Group and energy associations via various communication channels (email, phone, video conferences, meetings)</li> <li>+ Preparation of annual reports on the year’s agenda for GSEP (committee meetings – 2 times per year; meeting of CEOs)</li> </ul>	<ul style="list-style-type: none"> <li>+ Business Development Department.</li> <li>+ In line with meetings calendar and upon request</li> </ul>
7	<b>London Metal Exchange (LME)</b>	<ul style="list-style-type: none"> <li>+ Development of the global market for low-carbon aluminium in order to reduce aluminium operations’ impact on the climate</li> <li>+ Raising buyers’ demand for low-carbon aluminium</li> </ul>	<ul style="list-style-type: none"> <li>+ Participation in meetings and joint discussions</li> <li>+ Participation in relevant conferences and forums within the framework of the initiative “Aluminium for Climate”</li> </ul>	<ul style="list-style-type: none"> <li>+ Capital Markets and Strategic Initiatives Department</li> <li>+ In line with conference calendar and upon request</li> <li>+ Interaction reports to the Board of Directors</li> </ul>
8	<b>Suppliers</b>	<ul style="list-style-type: none"> <li>+ Feedback from the Group regarding the quality of goods, services and procedures (ethics, environment, etc.)</li> <li>+ Openness and transparency of reporting, strategy, environment and social responsibility (suppliers of consultancy services)</li> </ul> <p>Interests of the Group regarding suppliers:</p> <ul style="list-style-type: none"> <li>+ Guaranteed supply of quality goods and services</li> <li>+ Control over supplied goods’ compliance with the environmental and ethical standards of the Group</li> </ul>	<ul style="list-style-type: none"> <li>+ Receiving information regarding suppliers bidding for supply of goods and services prior to conclusion of contracts</li> <li>+ Mandatory technical audit of production facilities to control quality, compliance with the environmental requirements in operations upon conclusion of contracts</li> <li>+ Audit of financial, tax and reputational status of suppliers at the selection stage and upon conclusion of contracts. If breaches are found, the Group discusses correction plans and timelines with the breaching suppliers</li> <li>+ Furnishing information upon requests by suppliers regarding quality of goods and information regarding various aspects of the Group’s activities via various communication channels (email, phone, video conferences, meetings)</li> </ul>	<ul style="list-style-type: none"> <li>+ Commercial Department</li> <li>+ On a continuous basis</li> <li>+ Reporting to top management</li> </ul>



#	Stakeholder	Information / interests of stakeholders	Procedure / tools of interaction between the Group and its stakeholders	Group unit / frequency / oversight
9	<b>Customers / buyers</b>	<ul style="list-style-type: none"> <li>+ Receiving information regarding the Group's product mix, prices and market</li> <li>+ Support on contracts and prompt decision making regarding new contracts</li> <li>+ Information regarding the Group's standards (quality, environment, ethics, etc.)</li> </ul> <p>Interests for the Group:</p> <ul style="list-style-type: none"> <li>+ Support by the customers / buyers of the Group's policies on quality, environment, ethics, sustainable development</li> </ul>	<ul style="list-style-type: none"> <li>+ Provide information on full cycle of operations under new and already concluded contracts via various communication channels (email, phone, video conferences, meetings)</li> <li>+ Regular meetings with customers, incl. providing complete information regarding products and prices</li> <li>+ Participation of the Group in relevant forums and conferences to inform customers about products, market situation, results of activities and plans of the Group (incl. regarding sustainable development and implementation of low-carbon technologies)</li> </ul>	<ul style="list-style-type: none"> <li>+ Sales and Marketing Department</li> <li>+ On a continuous basis</li> <li>+ Interaction reports to the top management</li> </ul>
10	<b>Stock exchanges</b>	<ul style="list-style-type: none"> <li>+ Financial statements and information regarding corporate governance of the Group (both public and non-public) in accordance with the requirements of stock exchanges</li> <li>+ Information regarding corporate governance and development strategy</li> <li>+ Information regarding ESG</li> </ul> <p>Interests for the Group:</p> <ul style="list-style-type: none"> <li>+ Interaction with stock exchanges to attract potential investors</li> </ul>	<ul style="list-style-type: none"> <li>+ Submission of regular reports on the Group's activities in accordance with the stock exchanges' requirements</li> <li>+ Providing information upon request by stock exchanges via various communication channels (email, phone, video conferences, meetings)</li> <li>+ Monthly meetings with representatives of stock exchanges to discuss Group activities</li> </ul>	<ul style="list-style-type: none"> <li>+ Capital Markets and Strategic Initiatives Department</li> <li>+ In line with reporting calendar, monthly meetings and upon request</li> <li>+ Interaction reports to the Board of Directors</li> </ul>
11	<b>Financial market regulators</b>	<ul style="list-style-type: none"> <li>+ Compliance with requirements on information disclosure and corporate governance</li> </ul>	<ul style="list-style-type: none"> <li>+ Submission of regular reports on the Group's activities in accordance with the set requirements</li> <li>+ Providing information upon request via various communication channels (email, phone, video conferences, meetings)</li> </ul>	<ul style="list-style-type: none"> <li>+ Capital Markets and Strategic Initiatives Department</li> <li>+ In line with reporting calendar and upon request</li> <li>+ Interaction reports to the Board of Directors</li> </ul>

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12	<b>Rating agencies (RAs)</b>	<ul style="list-style-type: none"> <li>+ Disclosures and regular updates on the Group's activities for calculation of financial ratings</li> </ul>	<ul style="list-style-type: none"> <li>+ Meetings and exchange of required information with representatives of RAs</li> <li>+ Providing information upon request via various communication channels (email, phone, video conferences, meetings)</li> </ul>	<ul style="list-style-type: none"> <li>+ Capital Markets and Strategic Initiatives Department</li> <li>+ Occasionally and upon request</li> <li>+ Interaction reports to the Board of Directors</li> </ul>
13	<b>Governmental authorities / regulatory bodies</b>	<ul style="list-style-type: none"> <li>+ Ensuring the wholesale market for electricity functions effectively and that capacity is maintained</li> <li>+ Overseeing the regulated segment of energy resource supply</li> <li>+ Ensuring industrial safety of electric and thermal energy production facilities, mineral resources management, industrial operations</li> <li>+ Compliance with the environmental protection requirements</li> <li>+ Ensuring employment, job security and health and safety at the Group's production facilities</li> <li>+ Transition to renewable energy sources</li> <li>+ Ensuring sustainable development of the Group's operations in the respective regions</li> <li>+ Performance under agreements for social and economic development with regional and local administrations</li> </ul>	<ul style="list-style-type: none"> <li>+ Full transparency on performance in accordance with the prescribed parameters for the operation of the Group's production facilities. This includes providing access and required information to the supervisory authorities through regular checks, substantiation of tariff, etc.</li> <li>+ Interaction with the authorities, on a permanent basis, through email communication, official letters and via <a href="http://www.regulation.gov.ru">www.regulation.gov.ru</a></li> <li>+ Participation in ministerial, interinstitutional, and regional meetings to develop common solutions to matters of electric and thermal energy production, sustainable development and mineral resources management, at the federal, regional and local levels</li> <li>+ Participation of the Group in meetings, workshops and round tables with representatives of authorities of various levels regarding issues of industrial regulation and social and economic development of the regions where the Group has operations</li> </ul>	<ul style="list-style-type: none"> <li>+ Government Relations Department; Heads of regional operations</li> <li>+ On a regular basis and on request</li> </ul>

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14	<b>National and regional business associations</b>	<ul style="list-style-type: none"> <li>+ Areas of development for the energy sector and mineral resources management</li> <li>+ Technical regulations</li> <li>+ Transition to a low-carbon economy</li> <li>+ Impact of national economic policy on the operational activities, etc.</li> </ul>	<ul style="list-style-type: none"> <li>+ Participation in meetings and discussions on plans and joint resolutions by the Group and national/regional business associations via various communication channels (email, phone, video conferences, meetings)</li> <li>+ Participation in forums and conferences</li> </ul>	<ul style="list-style-type: none"> <li>+ Government Relations Department</li> <li>+ On a regular basis and upon request</li> </ul>
15	<b>Group employees</b>	<ul style="list-style-type: none"> <li>+ Ensuring the Group's compliance with employment law</li> <li>+ Ensuring safe working conditions and fair remuneration</li> <li>+ Ongoing projects and areas of development of the Group</li> <li>+ Participation in the Group's initiatives on local community development and environmental protection</li> </ul> <p>Interests of the Group:</p> <ul style="list-style-type: none"> <li>+ Receiving feedback from employees regarding their satisfaction with working conditions and possible problems/violation of their rights or business principles of the Group (environment, ethics, etc.)</li> <li>+ Engagement of employees in the development and implementation of projects of the Group at regional and local levels</li> </ul>	<ul style="list-style-type: none"> <li>+ Informing employees about Group news and projects by means of internal communications, i.e.: corporate weekly newspaper, corporate TV programs, emails)</li> <li>+ Intranet portal for Group employees</li> <li>+ Staff satisfaction surveys</li> <li>+ Ability to flag challenges via the corporate Hotline</li> <li>+ Contact with Workers Committees and Ethics Officers across the Group's operations as a means of fostering employer/employee dialogue</li> </ul>	<ul style="list-style-type: none"> <li>+ Human Resources Department</li> <li>+ Corporate Communications Department</li> <li>+ On a continuous basis</li> <li>+ Reports to the Board of Directors</li> </ul>
16	<b>Local communities</b>	<ul style="list-style-type: none"> <li>+ Understanding local issues and active participation of the Group in solving regional challenges</li> <li>+ Ensuring protection of the environment</li> <li>+ Participation in the improvement of regional infrastructure and public spaces</li> <li>+ Arranging cultural events</li> <li>+ Providing secure employment to local people</li> </ul>	<ul style="list-style-type: none"> <li>+ Regular meetings and forums with representatives of the local community to discuss projects involving the Group</li> <li>+ Annual community surveys to identify local challenges and target community development activities by the Group</li> <li>+ Partnership with local people on volunteering programs</li> </ul>	<ul style="list-style-type: none"> <li>+ Corporate Communications Department, Committee of Social Investments of the Group</li> <li>+ On a constant basis</li> <li>+ Interaction reports to the Board of Directors</li> </ul>

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17	<b>Local NGOs</b>	<ul style="list-style-type: none"> <li>+ The Group's programs to support the development of regional infrastructure</li> <li>+ The Group's programs for environmental protection and sustainable development</li> <li>+ Support given by the Group to the NGO's initiatives and projects</li> </ul>	<ul style="list-style-type: none"> <li>+ Regular meetings and interaction with the local NGOs, receiving feedback from NGOs</li> <li>+ Environmental protection projects under joint implementation with NGOs in unique natural areas (e.g. Lake Baikal)</li> <li>+ Grant contests to implement the initiatives of local NGOs</li> </ul>	<ul style="list-style-type: none"> <li>+ Corporate Communications Department, Sustainable Development Department</li> <li>+ Assessment of efficiency – 2 times per year</li> <li>+ Submission of reports to the Board of Directors</li> </ul>