



POLICY ON HUMAN RIGHTS EN+ GROUP IPJSC



APPROVED

by the Board of Directors of
EN+ GROUP IPJSC

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1. Purpose and Application

- 1.1. This human rights policy of EN+ GROUP IPJSC (the “Company” and together with its subsidiaries, (the “Group”) is based on compliance with the international principles in the field of human rights as stipulated in the Universal Declaration of Human Rights (adopted by the United Nations General Assembly on December 10, 1948), the International Labour Organization Declaration on Fundamental Principles and Rights at Work (adopted on June 18, 1998), the United Nations Global Compact, and the United Nations Guiding Principles on Business and Human Rights (adopted on June 16, 2011).
- 1.2. Respect for human rights is a fundamental value for the Group in ensuring its sustainable development. The Group is committed to supporting the principles reflected in this Policy.
- 1.3. The Policy on Human Rights is binding on:
 - + all corporate governance bodies of the Group, including the Board of Directors and its Committees;
 - + all structural units and production entities of the Group;
- 1.4. The Group expects that independent manufacturers and suppliers will adhere to these principles and encourages them to apply similar policies in human rights for their businesses.

2. Basic Principles on Human Rights

- 2.1. *Respect for human rights and freedoms*
 - 2.1.1. The Group respects human rights and freedoms and strives to detect and prevent any adverse human rights impacts of its business activities.
 - 2.1.2. The Group exercises due diligence and prevention of violation of human rights and freedoms, sexual harassment as well as discrimination based on nationality, ethnicity, gender, religious beliefs, or sexual orientation.
- 2.2. *Health and Safety*
 - 2.2.1. The Group is committed to ensuring safe working conditions and complying with relevant safety standards, healthcare standards, rules and internal regulations on health and safety for all employees of all facilities and business units of the Group.
 - 2.2.2. The Group is committed to creating and maintaining a working environment that minimizes risks of accidents, occupational injuries and threats to the health of its

employees. The Group strives to protect health and ensure safety of its employees, including by preventive measures.

- 2.2.3. The Group supports promotion and strengthening of the safety culture at production facilities and business units by raising awareness of its employees and by giving relevant training.
- 2.2.4. The ultimate purpose of the Group's approach reflected in its health, safety at work, industrial and fire safety regulations is achieving a zero injury rate and minimal environmental impact at all places of the Group's operations.

2.3. *Confidentiality and information exchange*

- 2.3.1. The Group respects private and family lives of its employees and those who are planning to seek employment with it; the Group ensures the protection of the personal data of all its employees and other stakeholders.
- 2.3.2. The Group always informs its employees about the purposes, proposed sources and ways of collecting personal data and undertakes not to disclose any aspects of their private lives without consent.
- 2.3.3. The Group operates in compliance with the Russian personal data protection legislation and monitors on a constant basis relevant international trends and best practices.

2.4. *Human rights and business partnership*

- 2.4.1. The Group expects that its business partners pay special attention to their own standards and procedures related to human rights, including the working conditions of their own employees.
- 2.4.2. While selecting suppliers of goods, works and services, business agents, consultants, etc. the Group, in addition to commercial interests, considers their readiness to comply with this Policy and the Code of Ethics of EN+ GROUP, which are public documents available on the corporate website of the Company.
- 2.4.3. The Group will never establish any type of partnership or will resign as soon as possible from any existing partnership with business agents that use child labour or any compulsory or involuntary labour, including not acquiring raw materials or goods if their production involves compulsory labour or human trafficking.

2.5. *Child and compulsory labour. Labour abuse*

- 2.5.1. The Group does not use or support the use by its business partners or anyone else any labour by workers below the permissible age stipulated by the national and international labour laws.

- 2.5.2. The Group does not tolerate any involvement of workers below the permissible age stipulated by the national international labour laws in any heavy works, or in harmful or hazardous working conditions.
- 2.5.3. The Group does not tolerate any form of compulsory or involuntary labour as defined by the International Labour Organization in Article 2 of the Forced Labour Convention (No. 29) adopted on June 10, 1930.
- 2.6. *Working hours, salary, paid leaves*
- 2.6.1. The salary payment system adopted by the Group's entities ensures the right of its employees to receive fair remuneration and equal payment for equal labour, subject to specific characteristics of the regions where the Group operates, including equal remuneration to both men and women for labour of equal value, subject to their experience and skills.
- 2.6.2. The Group complies with the national and international laws and the industry standards related to working time, non-working days and annual paid leaves.
- 2.7. *Engagement of local communities and stakeholders*
- 2.7.1. The Group acknowledges the impact it has on the lives of local communities in the countries where the Group conducts its business. The Group strives to interact with stakeholders among such communities and to take into account their opinions regarding its business practices.
- 2.7.2. Where appropriate, the Group strives to participate in the dialogue on human rights with local authorities and non-governmental organizations in countries where the Group has operations, by solving local issues at the local levels.
- 2.7.3. The Group strives to create economic opportunities and to strengthen its business reputation in the regions where it conducts its business, through relevant local-level initiatives.
- 2.8. *Right to Freedom of Association and Collective Agreements*
- 2.8.1. The Group has respect for and guarantees the employees' right to freedom of association, involvement or non-involvement in any civil society organizations, including labour unions, to the extent any such organizations' operate in compliance with applicable legislation. Employees that engage in such organizations and associations shall not be concerned with possible counteraction or persecution by the Group.
- In case employees are official representatives of such organizations and/or associations, the Group strives to establish constructive dialogue and good faith cooperation with any voluntarily elected representatives of its employees.
- 2.9. *Local communities and small indigenous minorities in the Group's regions of operation*

- 2.9.1. The Group takes into account the culture, habits and values of native local communities. Therefore, planning any major change to an ongoing project, or putting a new production facility in operation mandatorily involves the assessment of the possible impact, including any potential adverse impact, of any suggested initiative on the local communities.
- 2.9.2. The Group strives to attract local workers and provide such workers with vocational training. The Group provides equal remuneration to local workforce ensuring equal remuneration for equal labour.
- 2.9.3. The Group acknowledges the right of the local people, including its employees and their families, to a safe environment, which the Group ensures by adhering to the principles of sustainable development and by taking every all necessary measures to reduce any negative impact its production facilities may have on the environment. The Group's approach to environmental protection is reflected in the Policy on Environmental Protection Matters.

3. Adoption and Implementation

- 3.1. This Policy shall be implemented in the corporate processes across all production units and departments of the Group, including through undertaking the following mandatory actions:
 - 3.1.1. Ensuring free access to this Policy for all employees of the Group, its internal and external stakeholders;
 - 3.1.2. Compliance with this Policy in respect of each and every employee, and recognition of and support to human rights in respect of the counterparties and business partners of the Group;
 - 3.1.3. Continuous monitoring and assessment of the human rights environment in the countries of the Group's operation and regular implementation of any relevant changes in respect of the employees of the Group;
 - 3.1.4. Ensuring the operation of a human rights feedback system allowing to receive requests and statements from any stakeholder regarding compliance with human rights in the Group and to ensure timely and relevant response to any such requests or statements;
 - 3.1.5. Ensuring timely response to any cases of human rights violation in the Group and avoiding further recurrence thereof.
- 3.2. The Group is open to any inquiry by any stakeholder regarding the Group's compliance with human rights communicated to the Group in any convenient form and by any means indicated in the Contacts section of the Company's corporate website.

4. General Director's Commitment

The General Director of the Company undertakes to adhere to this Policy and:

- 4.1. To require that the managers at all levels strictly comply with the principles and obligations stipulated herein and take decisions based on them;
- 4.2. To demonstrate his/her personal commitment to the objectives and principles set out herein;
- 4.3. To provide utmost support in implementing this Policy.