



RUSAL



HUMAN RIGHTS POLICY

HUMAN RESOURCES
CORPORATE ETHICS

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1. TERMS AND DEFINITIONS

- 1.1. **RUSAL Group, the Group** – for the purposes of the Policy: UC RUSAL, IPJSC, subsidiaries of UC RUSAL, IPJSC with the ownership share from 50 % and above, regardless of their location.
- 1.2. **Business partner** – an individual or a legal entity, which is not a member or an employee of RUSAL Group, with which RUSAL Group closed or plans to close a transaction, including intermediaries.
- 1.3. **Child labour is work** performed by a person who has not yet completed compulsory schooling and is under 16 years of age¹.
- 1.4. **Discrimination** – restriction or deprivation of the rights of a certain category of citizens on the basis of race, gender, age, religious beliefs, ethnicity, social status, sexual orientation, nationality, social origin, financial status, political or other beliefs, health limitations, place of birth or any other characteristics or circumstances not related to the business qualities of the citizen.
- 1.5. **Stakeholders** – individuals and legal entities or groups of persons (employees, business partners, representatives of the business community, the government, local communities, etc.) that influence the activities of the Group or are subject to actual or potential, negative or positive impacts from the Group.
- 1.6. **Indigenous Minorities** – peoples living in the territories of traditional settlement of their ancestors, preserving traditional lifestyles, economic activities and crafts and recognizing themselves as independent ethnic communities.
- 1.7. **Local community** is a group of persons living and/or working in the Territories of Responsibility of the Group.
- 1.8. **Human rights** are the rights that belong to all people throughout the world. Human rights are indivisible, inalienable and universal and guarantee equality and dignity for every person.
- 1.9. **Forced labour** – all types of work (services) that are required from any person under the threat of any punishment (violent influence) and for which such person has not given consent, except in cases provided for by law.
- 1.10. Employees are individuals who are employed by companies of the Group. For the purposes of this Policy, Employees are all employees and managers of the Group.
- 1.11. **Territory of Responsibility of the Group** is the settlements where (or near which) the Group's productions are located that have a significant impact on the environment and social environment as a result of economic activities; in turn, the population and authorities of the territories have a direct impact on the operation of these Group enterprises.

2. GENERAL

- 2.1 This human rights policy (hereinafter referred to as the Policy) establishes the basic principles of activity, obligations and initiatives in the field of respect and protection of human rights.
- 2.2 Corporate values of the Group are based on respect for human rights.

This Policy forms unified approaches and requirements of RUSAL Group in the field of human rights. By adopting the Policy RUSAL Group undertakes to comply with its provisions and adhere to the core values, including the ethical principles and standards set forth in the Code of Ethics of RUSAL. When doing business the Group respects human rights and dignity of Employees, local communities, Business partners and suppliers of the Group, as well as Indigenous Minorities.
- 2.3 This Policy is top-level, it means, it prevails over the Equal Opportunities Policy. In the event of a conflict between provisions hereof and the Equal Opportunities Policy, the provisions of this Policy shall apply.

¹ Under the ILO Convention Concerning Minimum Age for Admission to Employment C138 (Geneva, 26 June 1973)

- 2.4. This Policy pursues the following goals:
 - 2.4.1. Establish principles and procedures aimed at protecting human rights.
 - 2.4.2. Establish a prudent approach to the protection of human rights and freedoms at the corporate level, having regard to the specifics of the Group's operations.

3. SCOPE OF APPLICATION

- 3.1. This Policy applies to all Stakeholders of the Group, including:
 - 3.1.1. Employees of the Group.
 - 3.1.2. Local Communities in the Territories of Responsibility of the Group.
 - 3.1.3. Business Partners of the Group.
- 3.2. This Policy applies to all business processes and businesses inside RUSAL Group without limitation.
- 3.3. This Policy covers legal entities, which are part of RUSAL Group regardless of their location.

4. LEGAL AND REGULATORY FRAMEWORK

- 4.1. The Group is guided by the federal and regional legislation of the Russian Federation and the legislation of other countries where it operates, municipal regulations, as well as recognized Russian and international human rights standards.
- 4.2. As a global group of companies, the Group carefully complies with the legislation of the countries, where it operates. If local legislation comes in conflict with international human rights and labour standards, the Group will strive to act observing the principles established by international human rights regulations and standards.
- 4.3. This Policy was developed with due regard for the principles and regulations set out in the following international and Russian documents:
 - 4.3.1. The Universal Declaration of Human Rights.
 - 4.3.2. Principal International Labour Organization (ILO) Conventions.
 - 4.3.3. The ILO Declaration on Fundamental Principles and Rights at Work and a mechanism of its implementation.
 - 4.3.4. The UN Global Compact (UNGC).
 - 4.3.5. The United Nations Guiding Principles on Business and Human Rights (UNGPs) approved by the UN Human Rights Council.
 - 4.3.6. The OECD Guidelines for Multinational Enterprises.
 - 4.3.7. The Declaration on the Rights of Indigenous Peoples.
 - 4.3.8. The UN Convention on the Elimination of all Forms of Discrimination Against Women.
 - 4.3.9. The Voluntary Principles on Security and Human Rights.
 - 4.3.10. The Social Charter of Russian Business (responsible business principles).
 - 4.3.11. GOST R ISO 26000-2012 Guidance on social responsibility.

5. APPROACH OF THE GROUP TO RELATIONS WITH STAKEHOLDERS IN THE HUMAN RIGHTS FIELD

5.1 In relationships with personnel the Group:

- 5.1.1 Advocates for diversity in labour of all companies and productions of the Group. Exercising the right to equal opportunities and non-discrimination, the Group recruits and employs personnel solely on the grounds of its own requirements for qualifications, experience and specific business qualities of candidates. The employment, training, promotion and compensation procedures do not discriminate on the basis of race, sex, age, disability, sexual orientation, gender identity and affiliation with any political, religious or labour organization or minority group².
- 5.1.2 Strictly respects the right of Employees to equality at workplace. Restrictions on labour rights due to circumstances, which do not involve the Employee's business qualities, are considered unacceptable.
- 5.1.3 Provides available information to the disabled persons about mobility aids, devices and assistive technologies, including new technologies, as well as other forms of assistance to create a comfortable and equal environment at workplace.
- 5.1.4 By virtue of the remuneration system effective at the Group's productions, it ensures the right of Employees to fair remuneration, as well as the right to equal pay for equal work, taking into account specifics of the region where they work, including equal remuneration for men and women for work of equal value, having regard for their experience and skills.
- 5.1.5 Strictly adheres to national and international laws and industrial standards regarding working hours, public holidays and paid annual leave.
- 5.1.6 Engages Employees to work only with their free consent. The Group does not participate in any form of forced labour. It is unacceptable to do any involuntary work on pain of punishment. The Group does not accept the use of any type of slavery throughout the supply chain, including forced labour, bonded labour and human trafficking.
- 5.1.7 RUSAL Group does not purchase or import raw materials and feedstock from countries and regions where violations of social, economic and cultural rights of the indigenous population are recognized (as defined by the UN Subcommission on Prevention of Discrimination and Protection of Minorities, as well as the UN Declaration on the Rights of Indigenous Peoples). RUSAL Group exercises control over Suppliers to make sure they do not purchase from countries and regions, where violation of rights of the indigenous population is recognized.
- 5.1.8 When using Child Labour in cases not prohibited by law, strictly complies with the requirements and limitations provided for by national and international labour law, including a ban on involving minors in work that may do harm to their health and moral development.
- 5.1.9 Respects and guarantees the right of Employees to freedom of association to protect their interests, including the right to collective bargaining. This implies establishing or joining trade unions and other membership organizations (at the employee's choice), including for the purpose of collective bargaining to reach agreements on working conditions.
- 5.1.10 Ensures privacy, personal and family secrets, protection of honour and good name, protection of personal data of all Employees and other stakeholders. Employees are always informed about the purposes, intended sources and methods of obtaining personal data; no aspects of the private life of Employees may be made public without their consent.
- 5.1.11 Strives to meet the highest safety standards and, accordingly, takes measures to protect health at workplace. The Group is committed to creating a safe and comfortable working environment at its productions that would meet safety and hygiene requirements.
- 5.1.12 Respects civil rights of Employees and recognizes their right to participate in political activities as private citizens. The Group does not finance political activities or provide support to political parties.
- 5.1.13 Does not tolerate corporal punishment, mental or physical coercion, harassment or gender-based violence, including sexual harassment or verbal abuse of Employees.

5.2 In relationships with Local Communities and Indigenous Minorities in the regions where it operates the Group:

- 5.2.1 Recognizes the impact of its operations on local communities in the regions and countries of its presence.
- 5.2.2 Respects the culture, customs and values specific to local communities, maintains a comprehensive and open dialogue with the Local Communities, including Indigenous Minorities, respects their right to cultural identity and traditional way of life. In order to protect the rights of the Local Communities, before opening new productions, as well as when planning major changes to existing projects, the Group assesses possible,

² Equal opportunities and non-discrimination are regulated by a separate Policy of the Company - the Equal Opportunities Policy, which relies on the basic principles of the Human Rights Policy.

including potentially negative, impact of this production on the local community and the environment. The Group strives to attract Employees from the local community, as well as organize their training to improve their skills. Employees from local communities are paid fairly to ensure equal pay for equal work.

- 5.2.3 Recognizes the right of the local community, including the right of Employees and their families, to the safe environment, and therefore is guided by the principles of sustainable development and strives to reduce the negative impact on the environment. The Group's approaches to environmental activities are set out in the Environmental Policy.
- 5.2.4 If there are objects and values of spiritual and cultural heritage in the area of influence of the Group, it takes appropriate measures to preserve these objects and ensure the right of permanent access to such objects or values in accordance with the national and international law.
- 5.2.5 Does not take part or assist in organizing armed conflicts, does not violate human rights in conflict and in high-risk areas, and also avoids mining, supply and use of conflict minerals in production, the proceeds from which can be used to finance violence in mining countries, and does not contribute to the commission of these actions.
- 5.2.6 Strives to avoid situations that could lead to forced relocation of local communities. Where unavoidable, the Group undertakes to comply with all applicable laws and regulations relating to the relocation of local communities.
- 5.3 In relationship with Business partners the Group:

- 5.3.1 Respects human rights when selecting Business Partners and interacting with them, and takes measures to ensure its Business Partners read and learn this Policy and share the Group's commitment to respecting, supporting and promoting human rights. Business Partners are expected to pay particular attention to their internal human rights regulations and procedures, including the labour conditions of their Employees. When selecting suppliers of goods, works and services, business intermediaries, consultants, etc., the Group is guided, in particular, by their willingness to comply with the Group Business Partner Code (hereinafter referred to as the 'Code') and this Policy..
- 5.3.2 Selects Business Partners that confirm and guarantee their compliance with all relevant rules of law, labour rights and human rights in relation to their employees, including involved migrant workers. Business partners of the members of the Combined Group affirm and guarantee respect for the personal freedom, rights and dignity of all employees, fair and equitable treatment, and non-discrimination, zero tolerance for workplace violence or harassment. Business Partners undertake to respect the rights of their employees to form and join trade unions and to bargain collectively. They also undertake to respect the rights of local communities and indigenous minorities when carrying out mining and production activities.

6. HUMAN RIGHTS AND SECURITY

- 6.1. Safety of Employees and security of facilities is one of the key safety priorities. The Group requires Employees of its own and contracted security structures responsible for security matters to ensure that they respect the right to personal safety of employees of production facilities of the Group, employees of contractors, local communities, as well as visitors of the Group.
- 6.2. The Group implements all necessary measures to prevent unauthorized and (or) disproportionate use of force by security personnel and does not tolerate harassment and abuse in any form.
- 6.3. RUSAL Group requires employees of secured facilities, employees of contractors operating on the territory of the Group's production and other facilities, as well as visitors to strictly comply with the rules of entry and intra-facility regimes established, as well as to comply with the lawful instructions of security officers.

7. POLICY PERFORMANCE CONTROL AND REPORTING

- 7.1. The Group monitors the respect of Human rights under the Policy in order to detect risks and act preventively.

7.2. The Group communicates with the stakeholders on a regular basis in order to obtain actual information on questions and concerns in the field of protection of human rights.

7.3. SignAL hot line is available 24/7 for confidential and anonymous reports, which can be delivered:

7.1.1 By E-mail: signal@rusal.com;

7.1.2 By phone (+7 800 234-56-40 Russia toll-free or +7 495 221-33-72 for international calls);

7.1.3 7.6. By WhatsApp, Telegram, Viber to +7 915 224-56-40).

7.4. When the Group detects risks and/or violation of human rights, it urgently develops an action plan to eliminate negative effects as well as takes measures to improve human rights protection.

7.5. HR Team is responsible for ensuring Equality and absence of bias in the Group. If a violation is detected, the Group undertakes to pass necessary measures, as well as train Employees to combat Discrimination and protect potential victims of Discrimination³.

7.6. The Group undertakes to inform business partners about the principles of human rights and freedoms adopted by the Group. Business partners are aware of the need to respect human rights principles, and the Group reserves the right to terminate business relationships in case of violation thereof.

8. REVISION OF AND AMENDMENT TO THE POLICY

8.1. RUSAL undertakes to update the Policy on a regular basis (at least once every three years) to best comply with the goals of the Group and/or possible changes in the international, national or regional legislation.

9. FINAL PROVISIONS

9.1. This Policy is publicly available in Russian and English on the Group's corporate website.

9.2. The Group respects the right of stakeholders to obtain reliable information about the Group's activities in the field of human rights protection, and therefore specifies these activities in the Group's sustainability report. We are open to requests from stakeholders: questions regarding the content and application of this Policy can be directed to our specialists by telephone and email. Our contact details are available on the Group's official website in 'Contacts'.

³ Respective mechanisms and procedures are disclosed in the separate Policy of the Company - the Equal Opportunities Policy, which relies on the basic principles of the Human Rights Policy.

