

APPROVED
by the Board of Directors of
PJSC SIBUR Holding
Minutes No. 232 dated December 17, 2020

HUMAN RIGHTS POLICY
LLC SIBUR and companies of PJSC SIBUR Holding

(Revision No. 1)

Tobolsk
2020

This Policy defines the position of LLC SIBUR and companies of PJSC SIBUR Holding (hereinafter the “Company and companies of PJSC SIBUR Holding”) on respect for human rights.

Article 1. General provisions

- 1.1. The Human Rights Policy (hereinafter the “Policy”) declares commitment of the Company and companies of PJSC SIBUR Holding to respect for human rights and intolerance to all forms of discrimination, sets forth the main principles and tools for human rights protection and guarantees that these rights are respected in all spheres of activity of the Company and companies of PJSC SIBUR Holding.
- 1.2. The Company and companies of PJSC SIBUR Holding take actions to prevent and rectify violations of human rights, if any cases are identified.
- 1.3. This Policy shall be read together with the Code of Corporate Conduct and the Counterparty’s Code of Business Ethics, as well as other relevant documents of the Company.
- 1.4. This Policy is public and published at the official site of the Company (www.sibur.ru).

Article 2. Terms. Definitions. Abbreviations

Forced labour shall mean all work or service, which is exacted from any person under the menace of any penalty and for which the said person has not offered himself voluntarily (Article 2.1 of ILO Convention No. 29)

Discrimination shall mean any distinction, exclusion or preference made on the basis of race, colour, sex, religion, political opinion, national extraction or social origin, which has the effect of nullifying or impairing equality of opportunity or treatment in employment or occupation (Article 1.1 of ILO Convention No. 111)

Article 3. Area of application

- 3.1. This Policy shall apply to all types of activities of the Company and companies of PJSC SIBUR Holding
- 3.2. The Company and companies of PJSC SIBUR Holding commit to the principles set forth in Article 4 of this Policy in relations with:
 - Employees.
 - Counterparties (vendors and contractors).
 - Counterparties from state and private sector.
 - Local residents within the footprint of the Company and companies of PJSC SIBUR Holding.
 - Other persons and groups of persons impacted by activities or products of the Company and companies of PJSC SIBUR Holding.

Article 4. Principles

- 4.1. The Company and companies of PJSC SIBUR Holding undertakes to comply with the laws of the Russian Federation and the generally recognized human rights in its activities. In particular, it undertakes to comply with the following principles:

- Treat all employees and stakeholders fairly based on respect for their dignity without any discrimination.
- Respect employees' right to freedom of assembly and association, freedom of opinion and expression.
- Prohibit forced and child labor.
- Ensure decent working conditions and remuneration sufficient to meet the basic needs of employees.
- Ensure a safe and healthy work environment for all its employees.
- Prevent violence at a work place.
- Comply with applicable environmental, occupational and industrial safety laws.
- Respect the rights, cultures and customs of local communities in the regions of the Company's footprint, including indigenous minorities.
- Refuse to act in a way that is or could be perceived as sexual harassment.
- Exercise zero tolerance for corruption.

Article 5. Tools

- 5.1. The Company and companies of PJSC SIBUR Holding seek to avoid any violations of human rights through efficient governance and due diligence procedures as part of their business activities.
- 5.2. The Company and companies of PJSC SIBUR Holding defined their main obligations:
 - Communicate this Policy to all stakeholders, including employees and counterparties.
 - Analyze main risks to human rights.
 - Maintain a continuous dialogue with stakeholders and consider their views on protection of human rights, as well as suggestions to improve the provisions of this Policy.
 - Inform all stakeholders about the possibilities of contacting the hotline in case of violations in the field of human rights protection.
 - Assess compliance with human rights on a regular basis in the course of activities of the Company and companies of PJSC SIBUR Holding as well as rectify any violations.
 - Develop due diligence procedures for human rights compliance in business processes, including impact assessments.
 - Interact with stakeholders in the course of assessments and rectify violations.
 - Conduct a regular monitoring to prevent possible violations of human rights.
 - Track changes in the laws of the respective countries, where the Company has a footprint, as well as in the international standards for human rights protection.
 - Cooperate with government and law enforcement agencies on human rights issues.

- Consider all appeals to the Hotline in a timely and objective manner.
- Introduce and implement programs aimed at creating safe and favorable working conditions.
- Improve human rights standards and practices to protect victims of rights violations.
- Publish relevant data on compliance with human rights according to the generally recognized international principles and laws of the countries with the Company's footprint in the annual sustainable development report.
- Update this Policy on a regular basis according to the Russian and international standards of human rights.

Article 6. Final provisions

This Policy has been approved by the Company's Board of Directors and is subject to routine review to ensure compliance with international standards on human rights as well as relevant Russian and international laws, including:

- 7.1. The Constitution of the Russian Federation (as accepted by the national referendum on December 12, 1993).
- 7.2. The Universal Declaration of Human Rights (as accepted by the United Nations General Assembly on December 10, 1948).
- 7.3. The International Covenant on Civil and Political Rights (as accepted on December 16, 1966 by Resolution No. 2200 (XXI) at 1496th Plenary Meeting of the UN General Assembly).
- 7.4. The International Covenant on Economic, Social and Cultural Rights (as accepted on December 16, 1966 By Resolution No. 2200 (XXI) at 1496th Plenary Meeting of the UN General Assembly).
- 7.5. The UN Guiding Principles on Business Activities and Human Rights.
- 7.6. ILO Declaration of Fundamental Principles and Rights at Work (as accepted in Geneva on June 18, 1998).
- 7.7. UN Declaration on the Rights of Indigenous Peoples.
- 7.8. United Nations Global Compact.