

OJSC Uralkali

Main Principles of Anti-corruption Policy

Policy's goals

The Anti-corruption policy is developed to set up the framework to comply with the anti-corruption statutes, promote ethical norms and principles and to minimize the corruption risk in Uralkali OJSC (further the Company).

This Policy is aimed at communicating to all parties concerned the zero tolerance of Uralkali OJSC to any kind of corruption, including intolerance to fraud and other acts of corruption.

Scope of application

The Anti-corruption policy applies to all employees of the Company without regards for their position. The Policy is mandatory for all the Group companies and is recommended for the contractors of the Company.

General provisions

Fraud is theft or acquisition of rights to the Company's assets by means of deception or abuse of trust, intentional actions or inactivity to cause misstatement of financial reporting as well as acts of corruption.

Acts of corruption involve offering, promising or giving of a bribe, requesting of intermediation in bribery or receiving a bribe in any form, including cash, non-monetary items, services and other benefits.

To achieve the Company goals the anti-corruption compliance framework has been implemented by the Company to assure its compliance with relevant Russian legislation. Also the Company considers it important to follow the principles of international anti-corruption legislation, including the UK Bribery Act.

General principles of the anti-corruption compliance frame work inUralkali OJSC

- **Top level commitment-** managers of any level comply with the requirements of the Policy and anti-corruption legislation, declare intolerance to corruption, lead by example their subordinates, and prevent acts of corruption by all means available to them.
- **Proportionate procedures-** the appropriate procedures are developed by the Company to minimize corruption risk. The procedures set up in Uralkali OJSC are proportionate to the size of the Company, practical, available for all employees, and implemented effectively.
- **Regular and timely risk assessment -**the Company regularly performs a risk assessment, including fraud and corruption risk, in order to monitor the business processes susceptible to corruption and undertake appropriate measures to minimize the risks identified.
- **Due diligence principle-** before the initiation or continuation of any business relationships, hiring new employees, participating in joint ventures or entering into relations with contractors or other third parties, the Company reviews their loyalty,

preconditions for conflict of interest, and connections to government officials and analyzes information regarding their reputation.

- **Communication and training** - the Company informs all concerned parties on the requirements of this Policy. To foster the corporate culture in the Company, newly hired management and employees operating in the processes related with corruption risk are introduced to the provisions of the Policy and related documents, while current employees are periodically trained either in person and/or remotely. Employees of sign statements confirming their compliance with this Policy each year as prescribed by internal regulations of the Company.
- **Monitor and review** – the Company on a regular basis monitors and reviews compliance of all employees with the Policy requirements and applicable anti-corruption legislation. The Company continuously improves its internal control system with particular consideration being given to the activities holding high fraud and corruption risk.

Basic elements of the anti-corruption compliance framework in Uralkali OJSC

- **Third parties relationships** – the Company confronts corruption in any form. To do that the Company has implemented such management tools as the corporate anti-fraud program as well as additional measures to encourage employees to report on any corruption facts known.

There is a whistleblower hot line operating in the company:

hotline@uralkali.com,

phone: 8 800 200 24 99; 8 (34253) 6 24 99.

- **Relationships with employees** – the Company expects that all employees follow the requirements of this Policy. On a regular basis, all employees of the Company participate in anti-corruption trainings and sign agreements to follow the requirements of the Policy. Employees annually sign agreements to follow it. Frequency, scope of information to be provided through training, as well as main principles and procedures for informing employees are stated in the “Procedure on informing Company’s employees of corruption prevention principles”.
- **Relationships with government authorities and the public** – the Company considers it unacceptable to obtain any unreasonable advantage in a project by paying any expenses or granting any privilege or other monetary or non-monetary benefits to officials, their close relatives (or in their interest) or other persons.
- **Information disclosure**– the Company performs financial, tax and management accounting in compliance with applicable laws and internal regulations to assure information availability to all the parties concerned.

All transactions are recorded in the financial ledger and other forms of accounting and based on the principles of completeness, accuracy and transparency.

- **Representational expenses and gifts** – receiving or giving of gifts, demonstrating hospitality indicate respect and politeness, help building trustful business relationships, providing they are symbolic and comply with a generally accepted business practice, do not raise a reputation risk for Uralkali OJSC, are not concealed bonuses, do not affect decision making, and do not encourage others to perceive them as such.
- **Charitable giving and sponsorship** – the Company does not participate in charity and sponsorship activities with the purpose of directly or indirectly influencing

decision making by government officials or other persons associated with the government or public agencies with potential to affect the operations of the Company.

- **Prosecution for acts of corruption** - the Company exerts all reasonable and legitimate efforts to promptly and inevitably prosecute for acts of corruption, or violations of the anti-corruption legislative requirements and internal anti-corruption regulations, regardless of the significance and form of such violations.

The Company holds the right to make public the information regarding persons prosecuted for acts corruption.

- **Protection against adverse consequences-** the Company guarantees that no sanctions, including dismissal, demotion, withdrawal of bonuses etc. will be applied to employees who refuse to undertake any kind of illegal action, including acts of corruption, even if this results in loss of monetary or non-monetary benefits for the Company, which could have been avoided only by violating the legislative requirements or provisions of this Policy.

The Company considers it unacceptable and aims at timely actions to protect the employees who report suspected incidents of corruption committed by another employee or other person even if this suspicion is not confirmed.

The Anti-corruption Policy is key to the promotion of ethical standards and principles in Uralkali OJSC and encourages building relationships with colleagues and third parties based on honesty and trust aiming at avoidance of actions that could harm the reputation of the Company or others parties.