

Approved by
CEO of
PJSC Uralkali
D. Osipov

Anti-corruption policy of PJSC Uralkali

1 Scope and purposes

This Anti-Corruption Policy (hereinafter the Policy) applies to all the Company's personnel regardless of their position, it is mandatory for all the members of the Uralkali Group and recommended for the Company's contractors.

This Policy is developed with the following purposes in mind:

- to create a proper environment conducive to compliance with the anti-corruption regulations, promotion of ethical principles and minimisation of corruption risk at PJSC Uralkali (hereinafter the Company);
- to advise all the interested parties on the legal requirements in the area of anti-corruption enforcement and basic principles of the Company's anti-corruption compliance framework;
- to enforce sound relationship in line with anti-corruption requirements between the Company's employees and third parties in the course of the Company's business.

Legal requirements in the area of anti-corruption enforcement, the present Policy and other internal regulations shall be observed unconditionally by all the Company's employees irrespective of their position, period of employment, status and other relationship with the Company.

2 References

This Policy is based on the following regulatory documents:

- The Russian Federation Criminal Code, of 13.06.1996 No. 63-FZ;
- The Russian Federation Code on Administrative Violations of 30.12.2001 No. 195-FZ
- Federal Law on Anti-Corruption Enforcement of 25.12.2008 No. 273-FZ;
- UK Bribery Act 2010 of 01.07.2011.

This Policy makes references to the following documents:

- PJSC Uralkali's Risk and Internal Control Management Policy
- The Code of corporate culture of Uralkali Group;
- Regulation on taking disciplinary action
- Regulation on advising employees on the PJSC Uralkali's principles of anti-corruption enforcement
- Corporate standard "Purchases"
- PJSC Uralkali's regulation on Call-center operations
- PJSC Uralkali's Regulation on Audit of contractors and contractual terms

and conditions

- PJSC Uralkali's Regulation on Representation Expenses
- PJSC Uralkali's Regulation on Business Gifts
- PJSC Uralkali's Regulation on Charity and Sponsorship

3 Basic terms, definitions and abbreviations

For the purposes of this Policy the following terms and definitions are used:

Anti-corruption law stands for regulations adopted in the Russian Federation and other applicable regulations regarding fraud, corruption and respective liability.

Anti-corruption Compliance Framework is a complex of corporate code elements, organizational structure, rules and procedures set by internal regulations aimed at ensuring compliance with anti-corruption enforcement principles by all employees regardless of their position.

Close relative means an immediate family member of a Company's employee, namely: spouse, parents, children, adoptive parents, adopted children, brothers, sisters, grand father, grand mother, grand children.

Uralkali group stands for Uralkali PJSC and its subsidiaries. Composition of the Uralkali group may change if new subsidiaries of Uralkali PJSC are established

Stakeholders are individual persons or legal entities interested in the Company's financial performance and other business results and capable of influencing the Company by their operations, opinions and decisions. Stakeholders include: employees, shareholders, investors, contractors, suppliers, buyers, the State and municipal authorities, social organizations, mass media, etc.

Conflict of interests is an opportunity for an employee to get benefit (material or otherwise) personally, for close relatives or friends to the detriment of the Company's or the Group's commercial, corporate or other interests. A conflict between representatives of the Company's different divisions does not constitute a conflict of interests.

Compliance manager is a Directorate employee in charge of supporting the Risk and Internal Control Management System in view of compliance with legal requirements, including methodological and practical support in order to improve internal controls of the corporate anti-corruption compliance framework.

Corruption is abuse of office, bribe giving and taking, abuse of power, commercial bribery or any other misuse by an individual person of its position against legal interests of a society or state, with the purpose to get a benefit in form of money, valuables, other property or material services or rights for themselves or third persons; or an illegal provision of such benefit to such a person by other individual persons. The above actions on behalf of a legal entity or in its interests also constitute corruption.

Fraud is stealing of other people's property or acquisition of the right to the Company's property by deception or breach of trust, including deliberate act or omission to act aimed at misrepresentation of financial statements.

Employee is an employee of PJSC Uralkali or other enterprise in the Uralkali Group.

4 General Provisions

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

To achieve these goals the Company has implemented an anti-corruption compliance

framework to assure adherence to the relevant Russian legislation. Also the Company considers it important to observe the principles of international anti-corruption legislation, including the UK Bribery Act.

The Policy comprises the principles of anti-corruption enforcement system and the basic elements of the Anti-Corruption Compliance Framework. The Anti-Corruption Compliance Framework in place at the Company is based on and complies with the RF law in force and applicable foreign law regarding anti-corruption enforcement.

The general principles of this Policy are available on the corporate web-site, thereby the Company openly declares its zero tolerance to corruption and encourages its contractors, employees and other persons to comply with the principles and requirements of the Policy. The Company is committed to mitigate corruption risks by any reasonable and legal ways.

5 General principles of Anti-Corruption Compliance Framework at PJSC Uralkali

5.1 Tone at the top

Managers of any level mandatorily comply with the requirements of the Policy and anti-corruption legislation, declare intolerance to corruption, lead by example, and prevent acts of corruption by all means available to them.

5.2 Adequate procedures

The Company has developed adequate procedures to minimize corruption risk. Adequate procedures set up in PJSC Uralkali are proportionate to the size of the Company, practical, available to all employees, and implemented effectively.

An organizational and methodological management by The Anti-Corruption Compliance Framework in the scope of fraud management and anti-corruption enforcement is vested with the Legal and Corporate Affairs Director.

Compliance Manager is responsible for practical and methodological support of Anti-Corruption Compliance Framework.

5.3 Regular and timely risk assessment

The Company regularly performs risk assessment, including fraud and corruption risk, in order to monitor the business processes susceptible to corruption and to undertake appropriate measures to mitigate the risks identified.

5.4 Due diligence principle

Before making a decision on initiating or continuing any business relationships, hiring new employees, participating in joint ventures or entering into relations with contractors or other third parties, the Company reviews their due diligence, preconditions for conflict of interest and connections to government officials and analyzes information regarding their reputation.

Applicants seeking employment with the Company are audited for their compliance with the requirements including those set in the Policy. The audit procedure is established in Uralkali's Regulation on Audit of contractors and contractual terms and conditions.

The procedure and criteria for the audit of contractors, partners, joint venturers and charity/sponsorship recipients are set in PJSC Uralkali's Regulation on Audit of contractors and contractual terms and conditions

5.5 Briefing and training

The Company informs all concerned parties on the requirements of the Policy.

To foster the proper corporate culture level in the Company, the newly hired management and employees involved in the processes related with corruption risk are briefed on the provisions of the Policy and related documents via an introduction training, while current employees are periodically trained either in person and/or remotely.

The Company's employees attend trainings personally as well as undergo remote training by way of familiarization with the Anti-Corruption Policy available on the corporate web site and specialized materials in the corporate newspaper, on information boards, by radio and on TV screens.

Annually, Compliance Manager uses the results of fraud and corruption risks re-evaluation to compile a list of persons to sign the declaration on compliance with the Policy as set by the Company's internal regulations.

Training procedures in the scope of compliance with the anti-corruption law are set in the PJSC Uralkali's Regulation on employees awareness of anti-corruption enforcement principles.

5.6 Ongoing monitoring and review

The Company regularly 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 involving a high fraud and corruption risk. When an existing corruption risk is detected, the information on violation within the Anti-Corruption Compliance Framework will be provided to the Compliance Manager.

Compliance Manager regularly monitors amendments to the Russian anti-corruption legislation and applicable foreign laws and also tracks cases of anti-corruption investigations initiated by the authorized agencies. The Company's internal documents will be amended in case of material amendments to the existing legislation.

The Company's employees shall direct any questions regarding legality of their actions in terms of the Anti-Corruption Compliance Framework to the Compliance Manager.

6 Basic Elements of Anti-Corruption Compliance Framework at PJSC Uralkali

6.1 Stakeholder relationships

The Company confronts corruption in any form. To do that the Company has implemented such management tools as the corporate fraud and corruption combating 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, telephone: **8 800 200 24 99; 8 (34253) 6 24 99**

The Company imposes strict requirements on the quality of the supplied goods, rendered services, contractors' reliability and their compliance not only with the law in force but also a recognized code of business including zero tolerance to corruption and discrimination. The Company insists on the anti-corruption clause to be included into its agreements with contractors.

Where the Company is a member of a legal entity or an association, the Company:

- informs them on the Policy principles and requirements;
- advocates for incorporation of policies or amendments into internal regulations of the entities above, containing the requirements similar to the Policy regarding anti-corruption law compliance.

The Company expects all its employees to adhere to the requirements of this Policy and

their commitment to the Company's values expressed in the Code of Corporate Conduct.

All the employees and managers in particular realize that they are the Company's representatives and their behavior towards external partners and third persons influences the Company's reputation.

6.2 Relationships with government authorities and the public

The Company considers it unacceptable to obtain any unreasonable commercial advantage by paying any expenses or granting any privileges or other monetary or non-monetary benefits to state or municipal officials, their close relatives (or in their interest) or other persons.

The Company does not participate in a political activity with a direct or indirect purpose to influence on the state or municipal officers or other persons related to the state, local or public bodies to make decisions affecting the Company's or the Group's operations.

The information on the Company's expenses related to its political activity is open to the public.

6.3 Information disclosure to stakeholders

In order to assure information availability to all stakeholders, the Company performs financial, tax and management accounting in compliance with applicable laws and internal regulations.

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

The Company does not allow any transactions without reflecting them in the accounting records, it also does not allow any distortion or fabrication of accounting, management or other data or supporting documents.

All the Company's transactions are exercised with due diligence and require an approval by authorized persons in compliance with internal regulations.

6.4 Representational expenses and gifts

Receiving or giving of gifts and demonstrating hospitality indicates respect and politeness, helps building trustful business relationships, providing they are symbolic and comply with a generally accepted business practice, do not raise a reputation risk for PJSC Uralkali, do not represent concealed bonuses, do not affect decision making, and do not encourage others to perceive them as such.

If in a employee's opinion, receiving a gift resulted in expectations by a contractor or third party of obtaining unreasonable benefits, the person shall inform their immediate manager.

When dealing with representatives of state and municipal agencies, it is strictly required to observe regulations regarding reasons and procedure for giving of gifts and other remunerations.

All the gift-associated expenses and representational expenses shall be correctly and properly accounted for in the expense statements.

Receiving and giving of gifts shall be done in compliance with the procedure set in the Regulation on Business Gifts.

Representational expenses are regulated by the PJSC Uralkali's Regulation on Representation Expenses.

6.5 Charitable donations and sponsorship

The Company does not participate in charity and sponsorship activities with the purpose to directly or indirectly influence decision making by government officials or other persons associated with the government or public agencies with a potential to affect the operations of the Company.

The information regarding all charity and sponsorship expenses of the Company is open to the public.

Participation in charity and sponsorship activities is regulated by the PJSC Uralkali's Regulation on Charity and Sponsorship

6.6 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 information regarding disciplinary and other sanctions for violation of the anti-corruption requirements set by the Policy can be found on the Company's intranet.

The Company holds the right to disclose the information regarding persons prosecuted for acts of corruption.

6.7 Waiver of retaliation

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 a loss for the Company of monetary or non-monetary benefits, incurred losses, 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 against retaliatory measures who in good faith report suspected incidents of corruption committed by another employee or other person even if this suspicion is not confirmed.

Our anti-corruption policy is key to the promotion of ethical standards and principles at PJSC Uralkali 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.

7 Responsibility for compliance with the Policy and its performance monitoring

Every employee of the Company is responsible for compliance with the Policy irrespective of their position. The Company encourages all its stakeholders to follow the principles of the Anti-Corruption Compliance Framework set forth in this Policy.

As the Company can be subject to penalties for the involvement of its employees, contractors, the Group members and other persons into a corruptive activity, internal investigations will be initiated in case of a reasonably justified suspicion or a corruption fact detected, to the extent indicated by an applicable law.

The procedure and measures regarding a response to detected violations of the Policy are set by the Regulation on response to a failure to comply with internal anti-corruption procedures.

8 Closing provisions

The Anti-Corruption Policy comes into force after its approval by the CEO Order and remains in effect for an unlimited period of time.

The Legal and Corporate Affairs Director is responsible for the enforcement of the Policy.
Uralkali PJSC

Director of Legal and Corporate
Affairs

M. Shvetsova