

RUSAL

THE BUSINESS PARTNER CODE

Approved by the Board of Directors of UC RUSAL, IPJSC
(Minutes dated 29 June 2026 No. 260602)

Put into effect by Order of the General Director of UC RUSAL, IPJSC
No. OKR-26-P056 dated 09 July 2026

TABLE OF CONTENTS

1. PURPOSE AND SCOPE OF APPLICATION 3
2. PROVISIONS OF THE CODE 3
3. REPORTING VIOLATIONS 7
4. TERMS AND DEFINITIONS 7

1. PURPOSE AND SCOPE OF APPLICATION

1.1. The Business Partner Code of the RUSAL Group (hereinafter referred to as the Group) defines the Group's principles in building business partnership as well as the requirements and expectations that Group Members place on the Business Partner, including suppliers of raw materials, inventory items, works and services, intermediaries, contractors, consumers, and beneficiaries, but not limited to them.

1.2. The document applies to all Group Members and is also taken into account in the Group's internal documents regulating engagement with the Business Partner.

1.3. The Group assumes that the Business Partner, when engaging with the RUSAL Group (Group Member):
- adheres to the Group's approach, as set out in the provisions of the Code, from the beginning of engagement;
- strives to take all necessary efforts and actions to ensure that activities when building business partnership comply with the principles and requirements of the Code, and / or applies its own comparative regulatory documents, notifying the relevant Group Member thereof;
- acknowledges that all existing regulatory documents of the Business Partner and business relations with the Group Members comply with the provisions of the Code, or declares the intention to bring them into compliance with the provisions of the Code;
- if it considers the principles and requirements of the Code unacceptable, informs the Group Members about this at the stage of discussing the possibility of business partnership.

1.4. Group Members have the right to request regulatory and other documents from the Business Partner that confirm the compliance of the Business Partner's activities with the provisions of the Code.

1.5. The Code is based on current Russian and international regulatory documents and standards, as well as on the Group's internal regulatory documents.

2. PROVISIONS OF THE CODE

The Code describes the Group's approach to engagement with a Business Partner across the entire value chain, starting from the setting of a business challenge:
1) defining the Group's goals when building business partnership;
2) making a fair choice of a Business Partner;
3) maintaining ethical standards in the business partnership;
4) managing environmental and social aspects of the business partnership;
5) building sustainable business partnership.

The Group carries out its activities exclusively in accordance with the current legislation governing operational activities in the relevant regions (hereinafter referred to as the Territories of Responsibility), as well as corporate regulations.

2.1 Defining the Goals of the Group when Building Business Partnership

It is important for us to clearly and precisely formulate from the very beginning the goals that we plan to achieve by building business partnership. The Group builds its engagement with its Business Partner on the principles of honesty, openness, and legality, ensuring maximum transparency and mutual trust.[1]

We openly communicate our principles to our Business Partner and declare that:

WE DO	WE DON'T
✔ follow the Group's **strategic goals** when setting tasks for business partnership;	⛔ hide our **goals and expectations** from business partnership;
✔ conduct an **objective assessment** of the needs for business partnership;	⛔ enter into business partnership in the absence of **mutual interest;**
✔ understand our **requirements and expectations** from the engagement and openly communicate them to the Business Partner;	⛔ limit **access to participation in the selection** to a pre-defined group of people;
✔ guarantee **equal access** to information for every potential Business Partner;	⛔ allow **illegal methods of collecting information;**
✔ include all necessary Group members and intermediaries in the **process of engagement** with the Business Partner.	⛔ ignore **feedback** from potential Business Partner about the goals and expectations of the partnership as well as his proposals.

2.2 Making a Fair Choice of a Business Partner

We select business partners based on clear and transparent criteria.[2]

We openly communicate our requirements and selection rules to the Business Partner and declare that:

WE DO	WE DON'T
✔ ensure **equal conditions** for each Business Partner participating in the selection;	⛔ support actions that violate **fair competition** between selection participants;
✔ formulate objective **criteria for selecting** a Business Partner, including quality, price, reliability and compliance with the Group's requirements;	⛔ hide information about the **criteria for evaluating proposals** from potential partners;
✔ indicate specific **deadlines** for submitting proposals, conducting an evaluation, and making a decision;	⛔ allow **unfair assessments** during selection;
✔ check a potential Business Partner for **correspondence with tax and compliance requirements;**	⛔ disclose **confidential information** contained in proposals from selection participants;
✔ record agreements at **each stage of the selection process,** including criteria, results, and grounds for decisions.	⛔ ignore **controversial situations that arise** during the selection process.

[1] *See Code of Corporate Ethics; Responsible Sourcing Policy; Compliance Policy.*
[2] *See Code of Corporate Ethics; Responsible Sourcing Policy; Compliance Policy.*

2.3 Maintaining Ethical Standards in the Business Partnership

We always maintain a professional and respectful tone in our dealings with business partners and do not allow deviations from ethical standards.[3]

We openly communicate them to the Business Partner and declare that:

WE DO	WE DON'T
✔ respect **personal freedom, dignity and human rights,** ensuring equal opportunities, trust, professional growth, and encouragement of initiative;	⛔ tolerate any form of **discrimination,** oppression or behaviour that would be considered offensive or unacceptable in the workplace;
✔ take into account the **cultural characteristics** of our Territories of Responsibility, advocate for a diverse personnel composition, and strive to attract employees from local communities;	⛔ provide assistance to **corruption** and do not allow **bribery;**
✔ guarantee the **confidentiality of information** (including personal data) and the protection of intellectual property;	⛔ allow situations that create the risk of **biased decisions** not meeting the interests of the Group, and we take measures to prevent or resolve **conflicts of interest;**
✔ inform the Business Partner of the **principles of the gifts and hospitality policy;**	⛔ require the Business Partner to **violate agreements** with its other partners;
✔ ensure **responsible origin of raw materials and supplies.**	⛔ produce, supply, or use **conflict minerals.**

2.4 Managing Environmental and Social Aspects of the Business Partnership

As an industrial company, we consider it critically important to increase our positive impact in our Territories of Responsibility and strive to reduce the negative effects of our operations. We strive to manage resources efficiently.[4]

We openly communicate to our Business Partner our approaches to **managing environmental aspects** in our Territories of Responsibility and declare that:

WE DO	WE DON'T
✔ ensure **sustainable consumption** of natural resources;	⛔ allow environmental requirements and consequences to be ignored at any stage of the **product life cycle;**
✔ implement **resource-efficient technologies** and promote the transition to a **circular economy;**	⛔ allow **unsustainable handling of hazardous materials and waste;**
✔ manage **climate risks** and develop measures to adapt to them;	⛔ refuse **rehabilitation of disturbed lands;**
✔ take measures to preserve and restore **biodiversity and ecosystems;**	⛔ hinder the implementation of **the best available techniques;**
✔ support and encourage the **implementation of green office practices.**	⛔ refuse to use **electronic document management** if all the necessary conditions are met.

[3] *See Code of Corporate Ethics; Responsible Sourcing Policy; Human Rights Policy; Compliance Policy; Policy on Gifts, Benefits and Hospitality; Sanctions Policy; Equal Opportunity Policy; Anti-Corruption and Bribery Policy.*
[4] *See Environmental policy; Biodiversity Conservation Policy; Responsible Sourcing Policy.*

We understand our responsibility to our employees and their families, as well as to the residents of Territories of our Responsibility, and strive to contribute to improving their quality of life. We put the lives and health of people above any financial results and production achievements.[5]

We openly communicate to our Business Partner our approaches to **managing social aspects** in the Territories of our Responsibility and declare that:

WE DO	WE DON'T
✔ conduct all necessary briefings and systematic training in the field of **labour protection, industrial and fire safety;**	⛔ allow working conditions that threaten the **safety or health of our employees;**
✔ comply with labor laws regarding **working hours, fair wages, and the provision of compensation and benefits;**	⛔ allow disrespectful **treatment of our employees** or discrimination on any grounds;
✔ respect the right of employees to **freedom of association** and to participate in political activities within the framework of the law in their personal time and at their own expense;	⛔ allow illegal employment and **unequal working conditions;**
✔ participate in the development of the Territories of Responsibility, supporting **socially significant initiatives;**	⛔ use **child labour or forced labour,** even if this is permitted by the laws of the countries where the Group operates;
✔ strive to prevent or mitigate the **consequences of forced displacement** for local residents.	⛔ support projects and events that negatively impact **social well-being.**

2.5 Building Sustainable Business Partnership

We value our Business Partner's expertise and strive for effective, long-term collaboration based on mutual trust and respect.[6]

We openly communicate our approaches to our Business Partner and declare that:

WE DO	WE DON'T
✔ fulfill our **obligations** to the Business Partner in accordance with the established agreements;	⛔ allow **termination** of business partnership without prior notice if such notice is provided for by the agreements;
✔ open to **renewing** business partnership if there is a mutual interest;	⛔ distort information that **affects existing agreements;**
✔ disclose our **reporting** in accordance with current legislation and voluntary standards;	⛔ refuse to discuss the **terms of business** partnership when new conditions and needs arise;
✔ analyse the **effectiveness and sustainability** of business partnership;	⛔ hinder the **exchange of knowledge and experience,** providing support and opportunities for development;
✔ provide relevant **information at the request of persons** authorised to monitor compliance with the requirements.	⛔ hinder joint initiatives aimed **at introducing innovations** and increasing business sustainability.

[5] *See Code of Corporate Ethics; Responsible Sourcing Policy; Human Rights Policy; Compliance Policy; Occupational Safety Policy; Announcement regarding Industrial and Fire Safety Policy; Social Investment and Charitable Activities Policy.*

3. REPORTING VIOLATIONS

In case of any issues related to the provisions of the Code and its application as well as in order to inform about violations, a Business Partner can contact the trust service "SignAL".

Please contact the hotline:
- by e-mail (signal@rusal.com);
- by phone (+7 800 234-56-40 (autoresponder) for toll-free calls within Russia, or +7 495 221-33-72 for calls from other countries);
- via WhatsApp, Telegram, Viber (by sending a message to +7 915 224-56-40).

When processing incoming requests, the Company guarantees confidentiality to its author, as well as an objective and competent examination of each message.

4. TERMS AND DEFINITIONS

Table 1 – Terms and Definitions

Term	Definition
Biodiversity	The diversity of life forms on earth (at the level of genes, species and ecosystems) requiring conservation to ensure the future well-being of humanity.
Beneficiary	A legal entity or an individual who is a beneficiary of Social Investments and/or a receiver of a charitable donation.
Bribery	Receiving a benefit by civil servants or employees of a public authority, either in person or through an intermediary, for performing any activity (inaction) for the benefit of the briber or persons represented thereby, where such activity (inaction) is within the official authority of the civil servants or employees of the public authority or where they can facilitate such activity (inaction) due to their official position, as well as for general aiding or conniving in the performance of their duties. In this case, the term 'bribe' will be used to refer to bribery of civil servants or employees of a public authority, and the term 'commercial bribery' will be used to refer to bribery of employees of a commercial entity.
RUSAL Group	RUSAL Group for the purpose hereof means: UC RUSAL, IPJSC – United Company RUSAL, international public joint-stock company, subsidiaries of UC RUSAL, IPJSC with a participatory interest of at least 50%, regardless of their location.
Business Partner	Any individual or legal entity who/which is not a Member or Employee of RUSAL Group and with whom/which RUSAL Group entered or plans to enter into a transaction, including Intermediaries.
Child labour	Work performed by a person who has not yet completed compulsory schooling and is under 16 years old.
Discrimination	Making unjustified distinctions between people based on their sex, race, colour, nationality, language, origin, property, family, social or official status, age, place of residence, attitude to religion, beliefs, affiliation or non-affiliation with public associations or any social groups, which infringe their legitimate interests, rights and freedoms.
Business Hospitality	Communication and Entertainment Arrangements.
Compliance	A principle of doing business in strict compliance with legal regulations by RUSAL Group, its Employees and Members of management bodies.

[6] *See Compliance Policy; Policy on Gifts, Benefits and Hospitality; Sanctions Compliance Policy.*

Term	Definition
Conflict minerals	Columbite-tantalite, cassiterite, gold, wolframite and their derivatives – tantalum, tin and tungsten revenues from mining/ processing/sale of which are used to finance an armed conflict (including illegal armed groups) in the Democratic Republic of Congo or its neighbouring countries (Angola, Burundi, the Congo Republic, Rwanda, Sudan, Tanzania, Uganda, the Central African Republic, Zambia).
Corruption	Abuse of one's official position, giving or receiving of a bribe, commercial bribery, making or demanding of facilitation payments, or any proposal, promise, provision, or acceptance of any financial or other advantage in any other form, in order to induce or encourage the recipient of such advantage or any other person to commit bad faith actions or to behave in a certain way at performance of one's duties, or any other illegal use by an individual of one's official position contrary to legitimate interests of the company or state for receiving a benefit in form of cash, valuables, other property, or property services for oneself or third parties.
Personal data	Any information relating to a directly or indirectly defined or identifiable natural person (data subject).
Political Activity	Personal or collective actions aimed at the expedient regulation of social processes by: shaping and changing the political will of citizens; influencing public authorities and participating in their work in elected positions; membership in political parties, social movements, organisations and associations, cooperating with them or assisting them, including in conducting political propaganda and agitation.
Intermediary	Any third party engaged by RUSAL Group and authorised to represent RUSAL Group before any other individuals or legal entities, or to act on behalf of RUSAL Group or on one's own behalf but to the benefit of RUSAL Group, including agents and advisors.
Supplier	An individual or legal entity that has entered into an agreement with the purchasing party for the supply of raw and other materials, products, works or services.
Forced labour	The performance of work against the Employee's will, under threat of any kind of punishment (violent, including psychological), in conditions that endanger the Employee's life and health, in the absence of social guarantees, etc.
Employee	An individual employed by the RUSAL Group who directly performs work under an employment contract.
Social Investment	Investing the RUSAL Group's resources in projects implemented in the Territories of Responsibility in order to achieve a positive social effect by improving the quality of life of the population and meeting their needs and aspirations.
Territories of Responsibility	Communities and territories where RUSAL Group's production facilities are located that have a significant impact on the environment and social environment in the course of their economic and socially responsible activities.
Member of RUSAL Group	Any legal entity, regardless of its location, that is part of the RUSAL Group.
Circular Economy	An economic concept aimed at ensuring the longest possible preservation of the value of materials and resources in circulation by closing the production cycle, narrowing it as much as possible (reducing the share of materials used) or slowing down the life cycle of a good or service.
Ethics	The moral beliefs and values governing human behaviour and relationships based on goodwill.