



EQUAL OPPORTUNITIES POLICY

HUMAN RESOURCES
CORPORATE ETHICS

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1. SCOPE OF APPLICATION

- 1.1. The Equal Opportunities Policy of UC RUSAL, IPJSC (hereinafter – the 'Policy') covers all employees, suppliers and contactors, as well as business partners of RUSAL Group. The Policy applies to the entire value chain of RUSAL and includes bauxite mining, alumina refining, aluminium and alloy smelting productions, as well as downstream.

2. TERMS AND DEFINITIONS

- 2.1. RUSAL Group, the Group – for the purposes of the Policy: UC RUSAL, IPJSC, subsidiaries of UC RUSAL, IPJSC with the ownership ratio from 50 % and above, regardless of their location.
- 2.2. 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.
- 2.3. 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.
- 2.4. 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.
- 2.5. Inclusiveness is a principle that underlies the Group's corporate culture and consists of creating an environment in which different socio-cultural groups of people and each individual severally are equally valued, accepted and respected for their unique skills, experience and contribution to the development of the company.
- 2.6. Local community is a group of persons living and/or working in the Territories of Responsibility of the Group.
- 2.7. Diversity is the multiple expressions of people's individual characteristics, including differences in age, gender, ethnicity, religion, health, sexual orientation, education, nationality, ability, social background and other characteristics, that provide a basis for empowerment of Employees.
- 2.8. Equality is the right of all people to be equal in dignity, the right to be treated with respect and consideration, and the right to participate on an equal basis with others in any area of civic activity or economic, social, political or cultural life.
- 2.9. 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.
- 2.10. Territory of Responsibility 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.
- 2.11. Tolerance is a sociological term, which means tolerance for a different worldview, lifestyle, behavior and individuality of Employees, suppliers, contractors, Business partners and other Stakeholders of the Group.

3. GENERAL

- 3.1. By adopting this Equal Opportunities Policy (hereinafter referred to as the Policy), RUSAL Group (hereinafter referred to as RUSAL, the Group) confirms its commitment to providing a comfortable and inclusive work environment in which Employees, Business Partners and representatives of other groups of Stakeholders will have the opportunity to apply their abilities and unlock potential.

- 3.2. This Policy forms a unified approach for all companies and productions of the Group to Diversity and Equality. By adopting the Policy, we undertake to comply with its provisions and adhere to our core values, including the ethical principles and standards set forth in the Code of Ethics and the Human Rights Policy of RUSAL Group.
- 3.3. This Policy relies on the basic principles of the Human Rights Policy.
- 3.4. The Group strictly complies with the laws of the countries where it operates in regard of Diversity and equal opportunities, and also takes additional measures to support stakeholders. The policy is based on generally accepted laws and principles of equality and justice.

4. BASIC PRINCIPLES AND APPLICATION

- 4.1 This Policy applies to all Employees, candidates for employment, suppliers and contractors, Stakeholders, Business Partners, as well as third parties employed or engaged by the Group or providing services on behalf of the Group.
- 4.2 We do not tolerate direct or indirect Discrimination in any form based on:
 - race and ethnicity;
 - gender;
 - health restrictions;
 - religion;
 - marital status;
 - maternity, paternity or guardianship status;
 - social status;
 - economic status;
 - political beliefs;
 - other signs and persuasions.
- 4.3 Diversity in the Group management:
 - 4.3.1 The Group is committed to increasing Diversity at all levels of the Group's organizational structure. Nominations to the Board of Directors, as well as to senior and mid-level management positions, are made on the basis of merit, experience, knowledge and skills of nominees, which ensures balance and diversity of expertise. The combination of professionalism and competencies of managers and other Employees provides the greatest breadth of views and opportunities for solving problems.
 - 4.3.2 To ensure Diversity and a high level of competencies of the Board of Directors, the management of RUSAL Group:
 - clearly formulates the criteria for selecting candidates in the charters of the Group companies and the Board Regulations;
 - conducts regular qualitative and quantitative analysis of the composition of the Board of Directors in accordance with the goals and strategic plans of the Group companies; and
 - sets goals to ensure continuity of the Board composition.
- 4.4 Diversity in the personnel structure. We ensure that the equal opportunities principle applies to all personnel management procedures. For this:
 - 4.4.1 We provide equal opportunities for recruitment, fair wages, promotions, benefits, and business interactions with Group companies. Employment and career advancement are provided in

accordance with the professional qualities of the Employees, as well as in accordance with the Company requirements established for a specific position, regardless of any signs of Diversity.

4.4.2 RUSAL Group strives to provide employment in the territories of responsibility, providing employment opportunities for both representatives of the Local Communities and migrants equally. The Group regularly analyzes a share of Local Communities in the workforce.

4.4.3 RUSAL Group strives to equalize the ratio of men and women in leadership positions. The Group analyzes the proportion of women in the workforce and in leadership positions and strives to equalize the ratio of men and women. We work to address the causes of the gender pay gap and strive to achieve pay equality between men and women;

4.4.4 RUSAL Group undertakes to conduct an audit of positions and specialties and take into account the special features and needs of disabled Employees when hiring for a specific position;

4.4.5 RUSAL Group strives to provide individual working conditions to maintain and preserve physical health for disabled Employees.

4.5 The Group recognizes the right of Employees to freedom of association and collective bargaining. Productions of the Group sign collective agreements on the terms agreed upon between the parties, which further regulate social and labor relations and ensure equality of opportunities regardless of the region and category of Employees.

4.6 Basics of non-discriminatory behavior in a team

The company pays great attention to building up business behavior consistent with the principles of Diversity, Inclusion and Equality, encourages tolerant attitudes and sees this as its strength and competitive advantage. Under this Policy, as well as the Code of Business Conduct and the Human Rights Policy, the Company undertakes to:

4.6.1 Establish relationships in the team that promote Tolerance and are based on mutual respect and trust;

4.6.2 Strive to build diverse teams, encouraging differences in life and professional experiences;

4.6.3 Eliminate any discriminatory practices when making decisions regarding career development and motivation of the Employee, with the exception of professional qualifications and efficiency;

4.6.4 Provide all Employees with equal rights to be heard and encourage the personal contribution of each Employee, regardless of Diversity or position;

4.6.5 Avoid making judgments based on prejudices and stereotypes about certain distinctive groups;

4.6.6 Avoid any discriminatory behavior, including physical and emotional abuse, any discriminatory comments or comments directed at individual characteristics.

5. POLICY PERFORMANCE CONTROL AND REPORTING

5.1. HR Team is responsible for ensuring Equality and absence of bias in the Group. If a violation of the Group's ethical principles is detected, we undertake to pass necessary measures, as well as train Employees to combat Discrimination and protect potential victims of Discrimination.

5.2. The Group's internal policies and procedures governing its approach to Diversity and Inclusion can be found on the Group's corporate website and internal portal. In addition, RUSAL Group conducts regular information campaigns to raise awareness of Employees and Business Partners regarding this area using

internal and external communication tools, as well as the UNIVER educational portal. Electronic versions of the policies can also be found on the corporate website and the internal portal for Employees.

- 5.3. We make efforts to ensure that Employees are treated with respect and consideration in the performance of their work duties. We are committed to non-retaliation against Employees and are committed to taking corrective action against any Discrimination against them.

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

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

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

5.4.3 7.6. By WhatsApp, Telegram, Viber to +7 915 224-56-40).

- 5.5. Information on the Group's activities relating to Diversity and equal opportunities will be disclosed in the Group's public reports.

6. REVISION OF AND AMENDMENTS TO THE POLICY

- 6.1. The Group 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.

7. FINAL PROVISIONS

- 7.1. This Policy is publicly available in Russian and English on the Group's corporate website.
- 7.2. 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 interested parties: 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'.

