



PJSC ALROSA

Human Rights Policy

APPROVED BY:
Resolution of PJSC ALROSA
Executive Committee
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1. GENERAL PROVISIONS

1.1. Objectives

This policy (hereinafter referred to as the "Policy") is the basic document defining the approach of PJSC ALROSA (hereinafter referred to as ALROSA or the "Company") to human rights activities.

The Policy declares the Company's adherence to human rights principles and its intolerance to any forms of discrimination, discloses the basic principles and human rights protection mechanisms in the Company, as well as ensures compliance with these principles throughout the diamond supply chain.

1.2. Basis for Development

The Policy is developed in accordance with the existing provisions of the Russian and international law considering the global and industry requirements applicable to the Company, voluntarily accepted obligations, provisions of the Company's internal documents, and recommendations of generally recognised standards and world's best practices.

The documents that has served as a conceptual framework for the development of this Policy include International Bill of Human Rights, International Labour Organisation Declaration on Fundamental Principles and Rights at Work, United Nations Guiding Principles on Business and Human Rights, Principles of the United Nations Global Compact, as wells as United Nations Sustainable Development Goals.

1.3. Scope

The Policy is applicable to PJSC ALROSA and is binding on all its structural and structurally separate subdivisions. The Company's regulatory, institutional, administrative and other documents could not contradict this Policy.

The Policy is recommended for adopting and enforcing in subsidiary and controlled companies of PJSC ALROSA for the purposes of harmonising its approach to sustainability issues and applying unified responsible business standards throughout ALROSA Group.

The Company expects its suppliers, contractors, clients and other business partners, the Group companies interact with, to maintain high standards of responsible business conduct in their activities and to adopt substantially similar responsible business practices.

2. APPROACH TO HUMAN RIGHTS ACTIVITIES

Recognising and respecting fundamental human rights and freedoms of all stakeholders is an integral part and an essential principle of ALROSA activities. The Company is committed to at all times respect human rights, acknowledges its responsibility therefor and is making every effort to prevent their violation, as well as to mitigate and, where necessary, remediate its possible adverse human rights impacts.

2.1. Human Rights Approach

ALROSA recognises universal, indivisible and inalienable nature of human rights, as well as the equality of people in their rights. Respect for human rights is the basis of the Company's activities and its firm priority.

Commitment to respect human rights covers all areas and stages of the Company's activity, including planning, exploration, diamond mining, manufacturing, sorting, cutting and sale of rough and polished diamonds, as well as measures for mine conservation and closure. ALROSA strives to ensure respect for human rights throughout its value chain by engaging with its business partners and developing comprehensive efforts to support the implementation of practices and standards similar to those of ALROSA throughout the supply chain down to the end consumer.

Recognising and respecting human rights lie at the core of engagement with all the Company's stakeholders, including members of management bodies, employees, people in operational regions (local communities), business partners, representatives of state authorities, public associations and organisations, as well as other individuals or groups affected by the Company's activities.

2.2. Basic Principles

In its operations, ALROSA is committed to the following principles:

- **Compliance**

ALROSA strictly adheres to provisions of applicable national and international law, including universally recognised principles in the field of human and labour rights. The Company continuously maintains and expands its participation in leading global and industry organisations and initiatives, including the UN Global Compact, World Diamond Council (WDC), Natural Diamond Council (NDC), Responsible Jewellery Council (RJC), International Council on Mining and Metals (ICMM), etc. ALROSA also ensures that its practices are in line with the provisions of internal regulatory documents, including the Sustainability Policy, the Code of Business Ethics, the Regulations on Responsible Diamond Supply Chain Management, etc. The Company constantly monitors changes in applicable regulatory and other acts, and also ensures their timely consideration in their operations in accordance with established procedures.

- **Priority of Life and Health**

Human life and health are an unconditional priority for ALROSA and a key benchmark defining the approach to its activities. The Company recognises and assumes responsibility for ensuring occupational and workplace safety, as well as maintaining favourable environment and minimising its negative impact thereon. ALROSA is committed to carrying out its security activities without violating human rights and warrants strict compliance with the relevant norms and standards in this area.

- **Non-discrimination**

ALROSA activity is based on the principle of zero tolerance to any form of discrimination, in particular on the basis of gender, race, colour, nationality, language, origin, property, family, social status, age, place of residence, attitude to religion, beliefs, affiliation or non-affiliation to public associations or any social groups, political and other views, or disability. The Company does not allow any distinction, exclusion, restriction or preference in rights based on any discriminatory grounds. All the Company

decisions regarding recruitment, salary, performance review, professional growth, training, sharing of responsibilities, retirement, dismissal, as well as other aspects of work are based solely on objective criteria, mainly the competencies of an employee. This also includes non-discrimination in the selection of suppliers and business partners.

- **Fair Treatment**

ALROSA considers it important to ensure equality and expand the opportunities of all its employees, and strives to build a culture of equal opportunities regardless of their gender, nationality, cultural and other characteristics. As one of the key objectives the Company sees the maintenance of an equitable inclusive environment that allows employees to reveal their personal qualities in the best possible way, pursue their professional capacity and achieve the highest results, and allows the Company to most effectively implement its mission.

- **Stakeholder Engagement**

ALROSA sees effective stakeholder engagement as one of the core operating principles ensuring respect for human rights. Maintaining an open dialogue and balanced consultation with stakeholders in decision-making is an integral part of the Company's activities. Stakeholder engagement is based on the principles of mutual respect, transparency and accountability. The Company continuously works on identifying its stakeholder groups, keeping them informed and engaged in cooperation on its activities, ensuring effective grievance mechanisms, and timely responding to human rights-related complaints.

3. KEY HUMAN RIGHTS COMMITMENTS

One of ALROSA major objectives is to ensure safe, decent and fair working conditions for employees with full respect for human rights and freedoms without any discrimination, and to contribute to socio-economic development of operational regions and improve the well-being of their population taking into account interests and culture of local communities, and indigenous people.

ALROSA has assumed the following human rights obligations:

3.1. Avoidance of Forced Labour

Acting in full accordance with the provisions of ILO Forced Labour Convention (No. 29) the Company does not tolerate any form of forced or compulsory labour performed under the threat of any punishment or violence, including slavery, bonded labour, kidnapping, deception or false promises, threats and other exploitative practices, including their hidden forms. ALROSA guarantees its employees a voluntary nature of work, formal employment relationship in accordance with applicable law, confirms the right to voluntary termination of employment, and expressly prohibits fines for voluntary termination of employment or work. The Company does not tolerate compulsion to financial contributions, confiscation of money or identity documents for the purpose of retaining employees against their will.

3.2. Avoidance of Child Labour

Guided by the provisions of the UN Convention on the Rights of the Child, as well as the applicable International Labour Organisation conventions, the Company strictly respects the rights of the child, avoids the use of child labour and strives to contribute to the achievement of the common goal of its global abolition. ALROSA has implemented reliable age verification mechanisms at place and under no circumstances employs persons who have not reached the minimum age established by ILO Minimum Age Convention (No. 138). Recognising the importance of protecting the health and safety of a child, as well as ensuring his physical, mental, moral and comprehensive development, when hiring people under the age of 18 the Company monitors, whether the nature of the jobs performed complies with applicable national and international law. ALROSA does not use the worst forms of child labour in its activities in accordance with ILO Worst Forms of Child Labour Convention (No. 182).

3.3. Decent and Equal Working Conditions

The Company warrants equality of rights and opportunities for employees when hiring, labour activities or termination of employment. When making decisions on hiring, working hours, salary or other payments, measures of social support, promotion, redeployment, performance review, training, disciplinary measures, dismissal, protection of employees' rights or other issues, ALROSA is guided exclusively by applicable labour regulations and clear rules adopted on their basis, which are common to all. The Company is committed to ensure decent and fair remuneration for all its employees, in particular, guarantees compliance with the minimum wage established by applicable law, as well as equal remuneration for men and women for work of equal value in accordance with ILO Equal Remuneration Convention (No. 100).

3.4. Safe and Favourable Working Environment

Providing its employees with healthy, safe, secure and favourable working environment is one of ALROSA key priorities. The Company is seeking to ensure that its operations comply with the high occupational health and safety standards, and is constantly working on strengthening workplace safety culture. ALROSA declares that any inappropriate or undesirable conduct, both singular and systematic, expressed in the form of words, gestures or acts, reasonably capable of irritating, disturbing, insulting, humiliating, intimidating or embarrassing others, that is aimed at undermining human dignity and rights

or creates an frightening, hostile or offensive workplace environment, including harassment, mobbing (bullying) or other forms of human rights violations, is unacceptable.

3.5. Freedom of Association

Social partnership is the basis for effective work and long-term development of ALROSA. The Company recognises the right of its employees to freedom of association and collective bargaining, and extensively contributes to its effective implementation in all forms established by applicable law. ALROSA welcomes and supports the right of employees to freely and voluntarily establish trade unions and associations, join them by choice and engage in collective bargaining to promote and protect their occupational interests. The Company recognises the importance of collective bargaining as an effective form of governing social and labour relations in the Company, and actively cooperates with the Interregional Profalmaz Trade Union of PJSC ALROSA employees in terms of joint development and decision-making on mutual commitments.

3.6. Respect for Culture, Customs and Traditions of Local Communities

The Company respects the culture, customs, traditions and lifestyle of local communities, paying special attention to supporting and preserving the cultural and historical assets of indigenous peoples. Recognising its responsibility for the impact on the livelihoods of population in the regions where it operates, ALROSA strives to ensure effective engagement with local communities and their involvement in deliberative and decision-making processes, including equity participation of local communities, which guarantees protection and proper consideration of their interests and expectations at the highest management level. Stakeholder dialogue in the regions of operation is based on the principles of mutual respect, transparency and integrity. Striving to ensure respect for the interests of indigenous peoples, in certain regions of its operation, as appropriate, ALROSA considers it essential to implement the principle of free, prior and informed consent (FPIC) as a means of accurately reflecting local people's needs and making voices of local rights-holders' heard.

3.7. Resettlement

ALROSA makes every possible effort to minimise the impact of its activities on the livelihoods of local communities in the regions where it operates. The Company strives to avoid involuntary resettlement of families or communities, and, where it is unavoidable, undertakes to obtain their free, prior and informed consent. It is also committed to implementing a set of measures aimed at preventing and mitigating possible adverse impacts associated with the planned resettlement. Any decisions regarding resettlement will be taken in accordance with an integrated action plan, drawn up based on consultations with stakeholders, building upon the primacy of human rights and the desire to improve living conditions and to ensure the well-being of displaced persons, respect for the rights and considering the interests of the most vulnerable population groups.

4. HUMAN RIGHTS ENFORCEMENT MECHANISMS

The Company undertakes to prevent human rights violations in its activities and address adverse impacts if they have occurred. ALROSA approach to ensuring human rights protection is based on implementation of due diligence procedures, including risk assessment throughout its entire supply chain, as well as developing and implementing necessary corrective actions and processes.

In order to fulfil the commitments made, ALROSA is implementing the following human rights enforcement mechanisms:

4.1. Human Rights Risk Management

ALROSA strives to prevent, minimise and mitigate adverse human rights impacts that may arise through its own activities or be directly linked to its operations. The Company considers human rights risk identification and assessment to be an integral part of its corporate risk management system. In accordance with the Risk Management Policy and Regulations on Responsible Diamond Supply Chain Management the Company continuously conducts comprehensive work on identifying, analysing and benchmarking the risks of human rights violations, develops measures to prevent, minimise and address relevant risks, and ensures monitoring and reassessment of risks. In assessing its impact and associated risks as well as while planning response measures, ALROSA makes every effort to ensure effective engagement with internal and external stakeholders whose rights and interests may be affected with a focus on the most vulnerable groups.

4.2. Addressing Adverse Human Rights Impacts

In cases of any actual or potential adverse impacts on human rights arising directly or indirectly from its activities or business relationships, the Company provides its stakeholders with access to remedies and undertakes to make efforts towards eliminating its adverse impacts and their consequences, and providing those affected by such impacts with full restoration of rights and restitution. ALROSA ensures implementation of human rights due diligence, including assessing actual and potential human rights impacts, integrating and acting upon the findings, tracking responses, and communicating how impacts are addressed, aimed at identification and impartial investigation of human rights violations, limiting their adverse impacts, proper consideration of stakeholder requests and responding to them, defining persons affected, as well as assessing and compensating for the harm caused to them. To prevent repeated human rights violations, the Company conducts examination to define the causes of adverse human rights impacts, taking into account its results when developing measures to minimise them.

4.3. Human Rights Training and Awareness Raising

To ensure common understanding of the Company's key human rights principles and requirements ALROSA communicates the Policy to its internal and external stakeholders, including human rights awareness raising campaigns and field-specific employee training. With due regard to employee functional responsibilities human rights training courses provide insights into corporate values in respect to acceptable workplace behaviour, business ethics standards, fundamentals and principles of labour relations, grievance mechanisms. The human rights training to cover employees at all levels, including the Executives.

4.4. Grievance Mechanism

In order to prevent and/or minimise the risks of human rights violations, and to provide an opportunity to confidentially and promptly raise a question or report concerns regarding possible or perceived human rights violations in ALROSA or among its stakeholders, the Company has established a grievance mechanism.

Submissions concerning the provisions of this Policy or any other issues regarding human rights and business ethics can be filed (including anonymously) by the Company's employees, customers, suppliers or any other stakeholders through any of the following channels:

- Email: ExternalRelations@alrosa.ru or anticorruption@alrosa.ru
- P.O. box for written communications marked "Hotline":
 - o 24 Ozerkovskaya nab., 115184 Moscow
 - o 6 ul. Lenina, 678170 Mirny, Republic of Sakha (Yakutia)

The Company's grievance mechanism is based on the principles of accessibility, confidentiality, efficiency, transparency and inclusiveness.

The Company maintains a documented record of submissions and ensures timely reporting on the results of their consideration to the parties concerned. The grievance management approach and the core operating principles are set out in a dedicated corporate policy (regulations).

4.5. Monitoring and Responsibility

ALROSA recognises proper human rights monitoring as an indispensable element of human rights due diligence procedures. The Company seeks to introduce monitoring and control procedures in its operations, which ensure comprehensive review of human rights compliance in all business processes, identification of areas to be addressed and timely initiation of appropriate responses and changes.

Human rights activities are monitored at ALROSA by the heads of the Company's departments, business units and subsidiaries within their competence, as well as by the Commission for Business Ethics Compliance and Settlement of Conflicts of Interest. Respect for human rights is also subject to periodic reviews as part of non-financial audits to ensure the Company's compliance with the fundamental standards and independent assurance of its non-financial reporting.

The Company's employees shall ensure their ethical behaviour and personal adherence to human rights principles in all aspects of their activities and be liable to disciplinary or other proceedings as established by applicable law for their acts or omissions having negative impact on human rights and entailing non-compliance with the provisions of the Policy.

4.6. Reporting and Accountability

In its commitment to the principle of transparency, the Company strives to ensure internal and external stakeholders awareness of its human rights activities. ALROSA tracks and publicly reports on progress of its activities in the field of human rights, including its approach, principles, adherence to social, labour and ethical standards, as well as measures taken to prevent, mitigate and remediate negative impacts in this area, in annual sustainability reports, reports through its participation in organisations and initiatives, on its corporate [website](#) and in other forms.

5. FINAL PROVISIONS

5.1. Policy Implementation

Monitoring the compliance with this Policy is assigned to PJSC ALROSA Chief Executive Officer - Chairman of the Executive Committee.

The Company communicates the provisions of the Policy to its internal and external stakeholders and expects them to recognise fundamental human rights and freedoms and to implement the fundamental human rights principles in all aspects of their activities.

5.2. Term and Revision of the Policy

This Policy is the Company's internal document of a permanent nature.

The Policy shall come into effect upon the approval hereof by PJSC ALROSA Executive Committee.

The Company will annually evaluate and, if necessary, review the Policy in order to improve, update and bring it in line with changes in the regulatory framework. The Policy may be amended upon the resolution of PJSC ALROSA Executive Committee.

GLOSSARY

PJSC ALROSA, ALROSA, the Company	one of the world's largest diamond mining companies, a Russian mining company partially owned by the government
ALROSA Group	PJSC ALROSA, its controlled companies (subsidiaries of the Company or other legal entities which are under direct or indirect control of PJSC ALROSA)
Applicable Law	a set of legal rules applicable to the relevant relationship
Best Practices	generally recognised management system organisation forms and elements, reflected, among other things, in the standards of leading global and industry organisations and initiatives as well as in rating assigning methodologies of the world's leading rating agencies
Child Labour	any types of work and activities that are associated with mental, physical, social or moral danger or harm to children, deprive them of an access to education, and also impede their well-being and comprehensive development
Discrimination	any distinction, exclusion, restriction or preference based on race, colour, sex, language, religion, sexual orientation, political or other views, ethnic or social origin which has the purpose and/or effect of nullifying or impairing the recognition, enjoyment or exercise, on an equal footing, of human rights and fundamental freedoms
Ethical Behaviour	behaviour of a person that fully complies with generally accepted moral principles, rules and norms of behaviour, ensuring that the rights and interests of other persons are not violated or limited
Forced Labour	all work or service which is exacted from any person under the threat of a penalty and for which the person has not offered himself or herself voluntarily
Global Reporting Initiative's (GRI) Sustainability Reporting Standards	generally accepted international standards for non-financial corporate reporting on sustainable development issues, including the economic, environmental and social impacts from day-to-day operations of an organisation. The system of standards includes generalised and thematic standards, as well as industry-specific schedules
Harassment	inappropriate or unwanted behaviour that may reasonably be perceived as threatening, offensive or humiliating to another person, aimed at intimidating of a person, undermining the person's dignity or infringing the person's rights, creating a frightening, hostile or offensive working environment
Human rights	rights inherent to all human beings, whatever their nationality, place of residence, sex, ethnic origin, colour, beliefs, religion, language, or any other status. Human beings are all equally entitled to their human rights without discrimination. These rights are all interrelated, interdependent and indivisible

International Bill of Human Rights	an aggregate of international legal norms and regulations on human rights set forth in the Universal Declaration of Human Rights, the International Covenant on Economic, Social and Cultural Rights, and the International Covenant on Civil and Political Rights and its two Optional Protocols
Local Communities	community of people living in the regions where the Company operates
Bullying/Mobbing	repeated intentional negative actions in the workplace against one person by another person or a group of persons with the purpose of causing moral or physical harm, diminishing rights, insulting or intimidating him
Stakeholders	individuals and legal entities or groups of persons (employees, customers, business representatives, civil society, governmental authorities, local communities, trade unions, etc.) that are to a various degree involved in the Company's activities and that affect the Company's performance and/or are impacted by the Company
Sustainability Report (Non-Financial Report)	a form of reporting documentation specifying non-financial performance indicators of an organisation for a reporting year, a tool for analysis and assessment of an organisation's activities in the economic, social and environmental sphere, and a means of informing the stakeholders on the results achieved. It can be prepared in accordance with such generally recognised international standards and guidelines as the Global Reporting Initiative (GRI), the International Integrated Reporting Standard etc.
Sustainability	<p>"Development that meets the needs of the present without compromising the ability of future generations to meet their own needs".</p> <p>A concept developed by the UN and recognising the role of business in ensuring the sustainable development of society.</p> <p>(Report of the World Commission on Environment and Development: Our Common Future (UN, 1987))</p>
Sustainable Development Goals (SDG)	<p>17 sustainable development goals and 169 related targets aimed at eliminating the root causes of global problems and covering three main aspects of the sustainable development including the economic growth, social integration and environmental protection, to be achieved by 2030.</p> <p>(Document – Transforming our World: the 2030 Agenda for Sustainable Development. Approved by the UN Resolution dated September 25, 2015)</p>
United Nations Global Compact (UN GC)	the United Nations voluntary international initiative aimed at stimulating the business to follow the principles of sustainable development, to introduce the practices of responsible business conduct, and to report on the results of activities in this field to ensure its participation in the solution of crucial global problems.

Worst Forms of Child Labour

All forms of slavery or practices similar to slavery, such as the sale and trafficking of children, debt bondage and serfdom and forced or compulsory labour, including forced or compulsory recruitment of children for use in armed conflict; the use, procuring or offering of a child for prostitution, for the production of pornography or for pornographic performances; the use, procuring or offering of a child for illicit activities, in particular for the production and trafficking of drugs, as defined in the relevant international treaties; work which, by its nature or the circumstances in which it is carried out, is likely to harm the health, safety or morals of children

ABBREVIATIONS

GRI	Global Reporting Initiative
ICMM	International Council on Mining and Metals
ILO	International Labour Organisation
KP	Kimberley Process
KPSC	Kimberley Process Certification Scheme
OECD	Organisation for Economic Co-operation and Development
RJC	Responsible Jewellery Council
SDG	UN Sustainable Development Goals
UN	United Nations
UN GA	United Nations General Assembly
WDC	World Diamond Council

REFERENCES

This Policy relies on the following key documents, including, but not limited to:

INTERNATIONAL

United Nations

- United Nations Millennium Declaration (2000)
- UN Sustainable Development Goals. Transforming our World: The 2030 Agenda for Sustainable Development (2015)
- International Bill of Human Rights
- Universal Declaration of Human Rights (1948)
- International Covenant on Economic, Social and Cultural Rights (1966)
- International Covenant on Civil and Political Rights (1966)
- UN Declaration on the Elimination of All Forms of Racial Discrimination (1963)
- UN Declaration on the Elimination of All Forms of Intolerance and of Discrimination Based on Religion or Belief (1981)
- International Convention on the Elimination of All Forms of Racial Discrimination (1965)
- UN Convention on the Elimination of All Forms of Discrimination against Women (1979)
- UN Convention against Torture and Other Cruel, Inhuman or Degrading Treatment or Punishment (1984)
- UN Convention on the Rights of the Child (1989)
- UN Convention on the Rights of Persons with Disabilities (2006)
- UN Guiding Principles on Business and Human Rights (2011)
- UN Global Compact (2004)
- UN Global Plan of Action against Trafficking in Persons (2010)

International Labour Organisation

- ILO Convention 29 Forced Labour Convention (1930)
- ILO Convention 87 Freedom of Association and Protection of the Right to Organise Convention (1948)
- ILO Convention 98 Right to Organise and Collective Bargaining Convention (1949)
- ILO Convention 100 Equal Remuneration Convention (1951)
- ILO Convention 111 Discrimination (Employment and Occupation) Convention (1958)
- ILO Convention 138 Minimum Age Convention (1973)
- ILO Convention 142 Human Resources Development Convention (1975)
- ILO Convention 155 Occupational Safety and Health Convention (1981)
- ILO Convention 159 Vocational Rehabilitation and Employment (Disabled Persons) (1983)
- ILO Convention 182 Worst Forms of Child Labour Convention (1999)

Other documents

- OECD Guidelines for Multinational Enterprises (2011)

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- OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (2016)
 - Global Reporting Initiative (1997)

Industry-Specific Regulations

- Kimberley Process Certification Scheme (2003)
- World Diamond Council System of Warranties Guidelines (2020)
- Responsible Jewellery Council Code of Practices (2019)
- ICMM Mining Principles (2020)

RUSSIAN

- Constitution of the Russian Federation (1993)
- Federal Law No. 197-FZ Labour Code of the Russian Federation (2001)
- Federal Law No. 10-FZ On Trade Unions, Their Rights and Guarantees of Their Activity (1996)
- Federal Law No. 124-FZ On Basic Guarantees for the Rights of the Child in the Russian Federation (1998)
- Federal Law No. 125-FZ On Freedom of Conscience and Religious Associations (1997)

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