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Public Joint Stock Company Uralkali

Approved by the Board of Directors
(Minutes No 412 dated 17.10.2022)

**CODE OF BUSINESS ETHICS
FOR SUPPLIERS OF PJSC URALKALI**

Berezniki, Perm Region

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1. Purpose

The Code of Business Ethics for Suppliers of PJSC Uralkali (the Code) was developed to formulate and formalise expectations of PJSC Uralkali (Uralkali or the Company) in terms of relations with its Suppliers (as defined below) on ESG matters.

2. Regulatory framework

This Code contains references to the following documents:

- The Environmental Policy of PJSC Uralkali
- The H&S Policy of PJSC Uralkali
- The H&S Policy Declaration of PJSC Uralkali
- The HR Policy of PJSC Uralkali
- The Human Rights Policy of PJSC Uralkali
- The Anti-Corruption of PJSC Uralkali
- The United Nations Universal Declaration on Human Rights
- Certain conventions of the International Labour Organisation.

3. Terms and definitions

This Code uses the following terms and definitions:

ESG Practices	practices related to environmental factors (including climate change), social factors and corporate governance.
UN	the United Nations.
Suppliers	suppliers and contractors of PJSC Uralkali.

4. Key principles

Uralkali is a leading player of the global potash industry. The Company produces potash fertilisers to help provide food to people around the world. In addition to operating unique potash deposits, Uralkali supports the development of regions of its presence for the growth of the Company and the well-being of its employees.

Adherence to the principles of sustainability outlined in this Code is a general priority element of the Company's relations with the Suppliers based on ESG Practices.

Uralkali acts in relation to its Suppliers without prejudice and treats them professionally and fairly, in line with the principles of sustainability.

In return, the Company expects its Suppliers and their affiliates to comply with this Code but without restricting their observance of potentially higher sustainability standards.

The Suppliers are recommended to implement sustainability principles within their organisations and extend the same across their supply chains.

The Company gives preference to those Suppliers that demonstrate commitment to sustainability principles and apply efforts to develop their ESG Practices or to adopt higher sustainability standards.

Uralkali regularly communicates this Code to the Suppliers and requests confirmations from the Suppliers of their efforts to ensure full compliance of their activities with sustainability principles,

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while taking into account the scale and nature of their business and current maturity of ESG Practices.

The Company reserves the right to audit the Suppliers for compliance with this Code and expects the Suppliers to provide complete and accurate information necessary for such audits.

Legal compliance

The Suppliers run their business in line with applicable laws and regulations of the Russian Federation and other jurisdictions regulating their business.

Environmental protection

The Suppliers comply with applicable environmental laws and regulations of the Russian Federation and other jurisdictions regulating their business. They implement actions to minimise adverse environmental impacts and continuously improve their environmental management system to ensure environmental safety of their operations.

Climate change

The Suppliers liaise with Uralkali to identify opportunities and initiatives helping combat climate change and acknowledge the importance of consistent efforts to create a greenhouse gas emission accounting system and to reduce greenhouse gas emissions and energy consumption.

Health & Safety

The Suppliers are responsible for the health and safety of their employees and observe high standards of health and safety that take into account specifics of their activities.

For their employees, the Suppliers provide safe and comfortable working conditions, necessary personal protective equipment, and regular health and safety training.

Employee well-being and human rights

The Suppliers respect human rights and freedoms as outlined in the UN Universal Declaration of Human Rights, as well as fundamental rights of employees provided for by applicable national laws.

The Suppliers adhere to the following principles of the main conventions of the International Labour Organisation:

- Prohibition of forced or compulsory labour;
- Prohibition of child labour;
- Prohibition of discrimination in respect of employment and occupation;
- Equal opportunities to employees;
- Decent wages to employees for their performance;
- Freedom of association and right to organise.

The Suppliers have internal regulations related to maximum working hours, wages and overtime in line with applicable labour legislation.

The Suppliers provide a working environment free of abuse, violence, threats or harassment.

Local communities

The Suppliers liaise with local communities and support the development of their operating regions.

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Corporate Governance

The Suppliers have an adequate system of corporate governance to ensure transparency of their activities, stakeholder trust and compliance with this Code and applicable laws.

Corruption and ethics

The Suppliers have sufficient controls in place to timely identify and address conflicts of interest. The Supplier can use Uralkali's hotline (hotline@uralkali.com) to report any potential or actual conflict of interest that affects or may affect impartiality of decisions in relation to the Suppliers by an employee of Uralkali.

Gifts that may be provided by the Suppliers to Uralkali's employees are given only for business gift purposes. They are part of normal business conduct, do not create reputational risks for Uralkali, are not meant as hidden remuneration, do not create any obligations for the recipient, are not meant to influence a decision, and do give cause to other persons to suspect such influence.

Accounting and reporting

The Suppliers document their commercial operations in accounting books and reflect them in their reporting, in full, accurately, with reasonable details and in a timely manner.

The Suppliers promptly provide their up-to-date financial statements as and when requested by stakeholders including Uralkali.

Protection of competition

The Suppliers conduct their operations strictly on the basis of free and fair competition, in compliance with applicable anti-trust laws in all jurisdictions where they operate. All officers and employees of the Suppliers are aware of and comply with applicable anti-trust laws in every aspect of their activities.

Confidentiality and protection of data

The Suppliers ensure proper handling of personal data, confidential information and intellectual property rights related to Uralkali and third parties.

Compliance with this Code

If a Supplier is found to be in breach of this Code, Uralkali reserves the right to request elimination of non-conformances or terminate relations with such Supplier.

If you become aware of an alleged breach of this Code or other ethics-related laws and regulations, please contact Uralkali's Hotline at hotline@uralkali.com. All messages will be registered and reviewed in a strictly confidential manner.

5. Final provisions

5.1. This Code is enacted and cancelled by the board of directors of PJSC Uralkali.

5.2. The Code shall be reviewed by the sustainable development committee (the Committee) of the board of directors of PJSC Uralkali from to time (but at least once every three years) to ensure it is up to date and conformant to applicable standards and practices. If necessary, the Committee shall propose recommended amendments for the approval by the board of directors of PJSC Uralkali.

5.3. This Code is published on Uralkali's official website at www.uralkali.com and is available to all interested parties.