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Public Joint Stock Company Uralkali

Approved by a resolution
of the Board of Directors
(Minutes 429 dated 19.07.2023)

The Code of Corporate Culture of PJSC Uralkali

Version 6

Berezniki, Perm Region

Preamble

1. This Code was developed by the Department of Internal Communications of PJSC Uralkali.
2. This Code was enacted by Order No. 1619 dated 03.08.2023.
3. This Code replaces Version 5 of the Code of Corporate Culture of PJSC Uralkali, which was approved by Order No 1560 dated 13.08.2019.

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1. Scope

1.1. This Code of Corporate Culture (hereinafter, the “Code”) was developed to create a strong corporate culture and enforce common standards of conduct and interaction rules.

1.2. Any internal document detailing the Code must not contradict it. If a contradiction is discovered in an internal document, the latter must be amended accordingly when it is next updated.

1.3. The Code applies to all employees of PJSC Uralkali (hereinafter, “Uralkali” or the “Company”).

2. Regulatory references

The Code contains references to the following internal regulations of the Company:

- Collective Bargaining Agreement
- Internal Labour Regulations
- Anti-Corruption Policy
- Human Rights Policy
- Procurement Standard
- Regulations on Disciplinary Actions
- Regulations on Access Control
- Regulations on Media Announcements
- Regulations on the Information Policy
- List of Information Constituting a Commercial Secret
- Regulations on Protection of Commercial Secrets and Confidential Information
- Regulations on Management of Subsidiaries
- Regulations on Conflict of Interests
- Regulations on Business Gifts
- Anti-Fraud and Anti-Corruption Programme
- Regulations on Processing and Protection of Personal Data
- Corporate Fraud and Corruption Prevention Programme.

3. Terms and definitions

The Code uses the following terms and definitions:

Uralkali Group means PJSC Uralkali and its subsidiaries. The composition of Uralkali Group may change if new subsidiaries of PJSC Uralkali are established

Employee - An employee of Uralkali or any other member of Uralkali Group.

External audience - Any group of persons who are not employed by the Uralkali Group and who demonstrate a real or potential interest in its operations.

Stakeholders - Various individuals or legal persons that has an interest in the financial and other performance of the Company in one way or another and that affect the Company through its own activities, opinions and decisions. The stakeholders of the Company include employees, shareholders and investors of the Company, counterparties, suppliers, buyers, state and municipal authorities, non-governmental organisations, mass media and others.

Privileged information - Any non-public information that creates rightful competitive advantages for the Company and/or Uralkali Group; its unauthorised use may give the Company’s or the Group’s competitors such advantages or cause harm to the Company or the Group. Privileged information may be represented with documents, as well as verbal and written communications, data, images, photos, audio and video files.

Third party - Any person who is not employed by the Group, including relatives, friends and acquaintances of Employees.

Close relative - A person who has close familial relationships with an Employee: spouse, parents, children, adoptive parents, adopted children, siblings, grandparents, and grandchildren.

Conflict of interest - A situation when an employee has an opportunity to get financial or any other benefit for himself / herself, his/her relatives or friends to the detriment of commercial, corporate or other interests of the Company or Group. A conflict between employees of different subdivisions of the Group shall not constitute a conflict of interests.

Personal data – any information directly or indirectly connected to an individual (the subject of personal data) including this person’s name, date of birth, address, details of an ID document or marital, social, property status or education, employment, income etc.

Corporate image - An aggregate perception of various aspects of the Company’s or Group’s activities by stakeholders and outside audiences.

Corporate style - A set of rules and graphics (logo, proprietary colours, etc.) reproduced on various sources - workwear, corporate clothes, stationery, souvenirs, letterheads, information stands, buildings, structures, transport, etc.

4. Abbreviations

Company – PJSC Uralkali

Group - Uralkali Group

5. General provisions

5.1. The Code of Corporate Culture was developed with the help of employees and managers of the Group.

5.2. This Code includes provisions related to the Company’s mission and vision of its purpose, future and development potential. The Code also describes general values and principles, standards and rules of conduct and interaction, which are common for every employee of Uralkali Group.

5.3. The Code aims to increase individual efficiency of each employee, improve interaction and mutual understanding (both between employees and subdivisions within the Company and between production facilities of the Group), set a benchmark for conduct in complicated, ambiguous situations related to work ethics, culture of business conduct, communication, legal and other risks.

5.4. All production facilities of the Group are united by a common goal – ensure production of sylvinit and potash fertilisers. Hence, the member companies’ strategic objectives are based on Uralkali’s mission and vision. At the same time, every member company of the Group has its specific features, unique professional goals and purpose, which may be reflected in relevant documents.

5.5. The provisions of the Code are mainly generalised; local regulations explaining the application of the Code for the Group members are developed (or amended) on the basis of the Code. The local regulations are developed with regard to specific aspects of each company, independence boundaries established for such company, traditions etc. However, the local regulations must not contradict this Code.

5.6. The Code is an important element of the Group’s corporate culture, which plays a vital role in maintaining a positive internal climate and supporting an environment of mutual understanding and trust.

6. Basis of corporate culture of Uralkali Group

Our corporate culture is based on the mission and vision statements of Uralkali Group. It should also be noted that Uralchem Group also has a mission and a slogan.

Uralkali’s mission outlines the ultimate purpose of the Company, while the vision expresses our perception of Uralkali’s future, long-term goals and prospects.

All production facilities of Uralkali Group should be guided by the mission and vision, and should also know and share the mission of Uralchem Group (please see Uralchem Group’s Code of Corporate Culture for more details).

6.1. Mission of Uralkali Group

We produce potash fertilisers to ensure that people all over the world are provided with food, as well as to support the development of our communities, the welfare of employees, and the growth of the Company through the efficient and responsible development of unique potash deposits.

6.2. Vision of Uralkali Group

- We are one of the world’s leading potash producers.

- We expand our production capacity to satisfy the growing demand for our products.
- Our production priorities are zero accidents and emergencies, and sustainable development of deposits
- Our Company is the most attractive employer in Perm Region and, potentially, across the mining industry as a whole.
- Our work is based on principles of clear division of responsibilities, risk-oriented management and management by performance.
- We rely on our employees: we develop and promote our best employees.
- We play an active role in the development of Berezniki and Solikamsk.
- Our activities are open for all stakeholders.

6.3. Values of Uralkali Group

Uralkali's values are the basis of our work. They unite all Company employees, regardless of their department, role or responsibility.

Our values give us strength and support to drive further development. They are designed to help each and every one of us in what we do.

We should aim to observe these values in work, no matter how difficult it may be.

Our values:

Safety: We personally comply with the relevant rules and demonstrate zero tolerance to non-compliance.

Responsibility: We always deliver on our promises on time.

Efficiency: We strive for achieving the best results at the lowest possible cost.

Teamwork: We respect and trust each other, and we know that a result can only be achieved by working together.

7. Business ethics of Uralkali Group. Stakeholder relations

Uralkali is a public company. It is one of the world's leading producers of potash and the largest employer in the region of its presence. Therefore, stakeholders set very high requirements to the Company, and to satisfy these requirements, we are governed by the following standards and principles.

7.1. Key standards of stakeholder engagement in Uralkali Group

- Compliance of the Company's activities with applicable laws of the Russian Federation and other countries, irrespective of the type of the Group's activities conducted. The Company places special emphasis on observing laws related to anti-trust, competition, insider information, environmental protection, securities, and labour.
- Full compliance with the requirements of stock exchanges where our securities are traded.
- Adherence to the Universal Declaration of Human Rights; acknowledgement of universality, indivisibility, interdependence and interrelation of rights and freedoms specified therein.
- Countering all forms of corruption. For this, the Company adopted various management mechanisms such as the anti-fraud and anti-corruption programme that covers all business process of the Company; anti-corruption clauses in supply contracts; additional measures to encourage reporting of corruption and fraud.
- Clear decision-making mechanisms to respect rights and interests of all stakeholders. This is implemented through an effective corporate governance system that includes general meetings of shareholders, the Board of Directors, the Management Board and other governing bodies. Also, the Sustainable Development Committee of the Board of Directors was created, which deals with health, safety, environment and social matters.

7.2. Stakeholder engagement principles

- Maintain a continuous dialogue with stakeholders to be able to anticipate and prevent risks and make necessary adjustments.
- Identify solutions that would ensure alignment of the interests of separate stakeholders with those of the

Company.

- Factor in different positions and viewpoints. Stakeholders' ideas and proposals in relation to the present and future of the Company help us see development opportunities and determine what needs to be done to achieve improvements in certain areas.
- Maintain constant monitoring of developments in areas related to the Company's activities; identification of global best practices and their implementation in Uralkali to the benefit of the Company and its stakeholders.
- Improve stakeholder relations. For this purpose, the Company regularly revises answers to the following questions:
 - Who can be called our stakeholders? Have any new stakeholders appeared?
 - Who can be called a voluntary stakeholder (e.g. employees or shareholders) and an induced stakeholder (e.g. local communities)?
 - What are the interests of the stakeholders in the Company?
 - What tasks does the presence of stakeholders create for the Company?
 - What opportunities do the stakeholders provide to the Company?
 - What responsibility or commitments does the Company bear to various stakeholder groups?
 - What steps does the Company can or should take to fulfil its obligations to the stakeholders in the best way possible?

7.3. Shareholder and investor relations

One of the most important goals of the Company is to improve its investment attractiveness and business reputation in the eyes of investors.

Investor trust in the Company is built upon openness according to the best global standards. We take every measure to fully and promptly inform our stakeholders of any material information regarding activities of the Company through public disclosures.

Our shareholders are key stakeholders for Uralkali. The Company gives equal respect to the interests of all of its shareholders, including their right to participate in the governance of the Company, and guarantees that their interests provided for by legal and internal regulations will be duly served.

7.4. Partner, supplier and counterparty relations

Partners and counterparties are very important contributors to attaining the Company's goals.

Uralkali builds its relations with partners and counterparties upon the principles of openness and mutual respect. The Company cooperates with them to consistently improve safety and efficiency and strictly meet the parties' commitments. At the same time, the Company also set stringent requirements to the quality of purchased goods and services, to the reliability of its partners and counterparties and their compliance with rules adopted by the commercial community, including non-discrimination, anti-corruption and anti-trust practices. Among of the tools used by the Company for these purposes are the Procurement Standard and the Anti-Fraud and Anti-Corruption Programme.

7.5. Employee relations

The achievement of goals and implementation of the business strategy of an organisation is entirely based on the people working in it. Uralkali forms relations with our employees on the basis of these standards and principles, as well as on the principles of social partnership and respect for the individual and their rights.

The Company offers its employees safe and comfortable labour conditions, a competitive remuneration package with social benefits, and opportunities for professional and career development. In return, Uralkali expects its employees to adhere to corporate values, principles, standards and rules as described in Section 8 of this Code, as well as to be loyal and involved.

7.6. Government and community relations

Uralkali aims to create and maintain sustainable and constructive relations with state and local authorities, which are based on openness, good faith, independence, and mutual benefit. Employees of the Company may get involved in politics unless it is forbidden by applicable law; however, they may not represent the Company in political parties and/or non-governmental organisations and use the Company's assets in any

way in these activities. Such participation is only allowed outside working hours and on the condition that it does not interfere with their primary duties.

We understand that the Company in one way or another affects local communities. Hence we try to contribute to the development of the region by helping with various issues and implementing development projects. Also, any decision that may affect local communities is based on social responsibility principles.

8. Principles, standards and rules of conduct and interaction in Uralkali Group

To ensure the efficiency of the Uralkali Group and its operation as a single entity, adherence to common values and generally accepted ethical norms is not enough. It is necessary that employees follow unified principles, standards and rules of interaction and conduct.

8.1. Principles of interaction between production facilities of Uralkali Group

- Interaction between production facilities of Uralkali Group should be based on cooperation and mutually beneficial partnership, equal opportunities for employees and reasonable balance of interests.
- When interacting with each other and making decisions, employees of the Group must:
 - Rely on standards of integrity and ethical conduct. For us integrity means a fair attitude to ourselves and others, good faith in the performance of our job duties, and compliance with the Company's rules and standards;
 - Appreciate what each production facility does and what contribution it makes to the achievement of the Group's goals and objectives;
 - Give proper regard to specific features of each production facility;
 - Be governed by values and provisions of this Code, including Subsections "Interaction between employees" and "Interaction between employees from different subdivisions";
 - Managers should also adhere to Subsection "Additional principles and standards for management".
 - The key principles for subsidiary management and relations are defined by the Regulations on Management of Subsidiaries.

8.2. Rules of ethics. Integrity.

Integrity is the foundation of trustful relationships between all stakeholders and it supports our confidence in long, beneficial and successful cooperation. To ensure this:

- We build our relationships with colleagues and third parties based on honesty, earnestness and trust aiming at avoidance of actions that could harm anybody.
- We treat assets and resources of the Company with care and do not let their embezzlement or improper use;
- We do not tolerate corruption. We do not offer, receive, demand or approve bribes or illegal gratification of any kind.
- We do not tolerate deceit, including fraud of any kind.
- We create equal opportunities for everybody and do not tolerate any kind of workplace discrimination.
- We always honour our commitments and never let down those who rely on us.
- We strictly abide by laws and standards, principles and rules that regulate the Company's activities and every employee's work.

8.3. Workplace conduct

A responsible workplace conduct of every employee is the foundation of a successful company. We respect and take into account the interests of our employees, and expect honest and conscientious behaviour from them, efficient and effective work, adherence to the established rules, and compliance with laws of the Russian Federation.

Follow the standards, rules and requirements specified in internal regulations of the Company: procedures, orders, instructions etc. Please take some time to become familiar with applicable documents and contact your supervisor or authors of the document for explanations or clarifications.

Perform your duties and tasks in a quality, conscientious and timely manner irrespective of whether your work will be checked by another person or not.

Working hours are a valuable resource, which should be used efficiently and as intended. Do not be late for work and return to your workplace promptly after prescribed breaks. Remember that your working time is given to address work-related issues, not personal matters. Plan your work accordingly to complete all tasks within a working day.

Avoid haste and rush jobs: not only do they often lead to poor quality and bad results, but may also affect human health and safety.

8.3.1. Inappropriate and unacceptable behaviour

The Company considers the following behaviour to be inappropriate and unacceptable

- being in the Company's territory in a state of alcoholic, narcotic or other intoxication;
- smoking in the Company's territory except in specially designated places and bringing smoking accessories to the mines;
- stealing or damaging the property of the Company's or the Group, as well as other employees' and third parties' property that is located in the Company's territory;
- use of abusive language which discredits human honour and dignity

(For more information, please see the Collective Bargaining Agreement; the Internal Labour Regulations; the Regulations on Disciplinary Actions, the Anti-Corruption Policy).

8.4. Interaction between employees

Polite, respectful, benevolent and amiable communication and interaction between employees is necessary to establish a favourable internal atmosphere and ensure efficient operations of the Company and the Group.

- Employees should be guided by principles of mutual support and assistance and rules as presented in Subsection 8.6 "Interaction between employees from different subdivisions". This will make relations within various groups of employees stronger, help to efficiently solve problems and create and maintain a favourable internal atmosphere. In difficult or conflict situations, employees are recommended to consult Subsection 8.5 "Conduct in complicated and conflict situations".
- At work, employees have to communicate intensively with their colleagues and representatives of stakeholders and outside audiences by telephone, e-mail and physically, during meetings. To increase efficiency of business communications, save time of the parties involved and get a prompt result, employees should follow not only general rules of comity, but also the Rules of Business Communications and Conduct described below.

8.4.1. Rules of business communications and conduct in Uralkali Group

8.4.1.1. Telephone communications

- Always give your full name when making telephone calls. Remember, that not every telephone can identify the caller. If this is the first time you called a colleague (or if you communicate on rare occasions), also say what your position and/or subdivision is.
- If you are the recipient of a call, it is also recommended to give your full name. This is especially required if there is one telephone number for several employees or if you pick-up a call to someone else.
- When answering an external call, always give the Company's name and/or your production facility/subdivision. You can, for example, say "Uralkali, Mine 2, good morning / afternoon!"
- Do not miss any call. If you were away from your work place or were unable to answer the phone, check the call list to return the call. If you are going to be out of office for two or more days, transfer your calls to your fill-in colleague.
- If you are entitled to a corporate cell phone, you are expected to always carry your corporate phone and pick-up your calls until 9 p.m. (or during your shift) and reply to text messages after 9 p.m. or on day-offs.

8.4.1.2. E-mail communications

- Always indicate the subject of your e-mails that would reflect the main point of your message.
- Always sign your messages, specifying your full name, position, subdivision (unless it is already specified in your position), company, and external and internal telephone numbers.

- If you are going to be away for two or more days, turn on the “Out of the office” function in your e-mail application to inform your colleagues of your absence and the time you will return to work. Waiting for a reply from an absent colleague would be a waste of time and would reduce communication efficiency.
- You are expected to reply to an e-mail at the first opportunity (unless you are away on a business trip, annual or sick leave), and necessarily within two business days (unless the e-mail specifies a different date). An electronic reply is preferable, although you can call or contact the other party in person.
- When sending documents or forwarding correspondence to your colleagues, explain what actions are expected from the recipient (acknowledge, comment on, fill in forms etc.). It is especially important if the recipient did not expect for your e-mail.
- Use the spellcheck function in your email application to find and correct typing and other errors that you did not notice yourself. A spellchecker is a must for e-mails intended for external recipients.
- The Company is expecting you to use your work e-mail only for work-related purposes.
- For the purpose of information security do not open attachments that were sent to you from unknown sources.
- If you have any doubts about any e-mail that you receive – forward it to antivirus@uralkali.com.
- If you follow an external link or enter your login/password, immediately notify the HelpDesk service.

8.4.1.3. Organisation of meetings and business appointments

If you are the initiator / organiser of a meeting:

- Respect the time and agenda of your colleagues: inform of the time of a meeting in advance and avoid changing the date or time of the meeting.
- Use the Calendar function in your e-mail application to send an invitation to a meeting. It is an obligatory requirement if you want to arrange a meeting with people from other subdivisions.
- In the invitation, specify the topic / agenda of the meeting to give participants enough time for preparation. If possible, attach materials for the meeting, if any.
- Before the meeting, make sure that every attending person understands the purpose and expected outcome of the meeting.
- Arrange the meeting to be within the scheduled time limit. Before closing the meeting, summarise the key points discussed and distribute the agreed actions / minutes by e-mail.

If you are a participant in a meeting:

- Use the invitation response option.
- Do not be late and do not make other participants wait for you. If you realise that you will be unable to attend, inform the meeting initiator as soon as possible.
- Set your cell phone to silent mode.
- Do not interrupt other speakers – wait for your turn.
- If you do not agree with a decision taken at the meeting, voice your discontent during the meeting. No decision may be changed unilaterally after the meeting.

8.5. Conduct in complicated and conflict situations

Complicated and / or conflict situations may occur when communicating with colleagues, superiors, subordinates or representatives of stakeholders and external audiences. Prevention or constructive resolution of such situations helps to maintain a positive climate among colleagues.

If you find yourself in a conflict situation, you are expected to be respectful to the other party, stay calm and try to resolve the problem through discussions and a constructive dialogue.

If you are unable to resolve the situation on your own, contact your immediate supervisor for help or other persons indicated in Section 9 “Application of the Code”.

It is easier to prevent a conflict than to resolve it, so you must try to avoid such situations, if possible. For that, try to follow several simple rules:

- Most disputes and conflicts arise from misunderstanding. Before starting an argument, make sure you

and your colleagues have understood each other correctly.

- Do not be ruled by your emotions: use a balanced and rational approach.
- Try to use negotiations as your main tool rather than threats and manipulations.
- Put yourself in the other party's position. How would you act in such a situation?

8.6. Interaction between employees from different subdivisions

When interacting with colleagues from other directorates, mines, functions, departments etc., please remember that the Company is only able to achieve its goals if all of its subdivisions work together. Follow the principles and rules described in this section.

8.6.1. Consideration of the interests of other subdivisions

- If your action or decision affects other subdivisions, make sure you give proper regard to their interests. Also, make sure your actions serve the interests of the Company as a whole.
- If in a certain situation the interests of your subdivision and another subdivision do not align or even directly contradict each other, try to come to a solution that would take into account the interests of both parties, or look for a compromise.

8.6.2. Respecting other people's time

- If you need assistance or participation of other subdivisions to perform your duties, make sure you notify them of your needs in advance. Specify the time you would like to receive a reply or see a result from them.
- Plan your joint activities in such a way that your colleagues have enough time to respond to your enquiry. If you have an urgent request, explain the reason for urgency.
- Remember that colleagues from other subdivisions are not experts in your field. When replying to queries from other subdivisions or sending your queries, make sure your answers or questions are clear and easy to understand.

8.6.3. Good-faith performance of obligations

- If you have a joint task with colleagues from other subdivisions, do not shift responsibility for your personal tasks and do not unilaterally extend their completion date.
- Inform your supervisor and / or colleagues in advance if you realise that you will be unable to discharge your obligations or complete a task on time to enable them to adjust their expectations accordingly.

8.6.4. Timely responses to requests, approvals and decision making

- Respond to queries from other subdivisions promptly, without being reminded to reply, even if you think the query is minor or insignificant.
- Do not delay decision-making for matters within your area of responsibility. Do not take actions that may prevent your colleagues from performing their duties.
- If you are authorised to approve or endorse documents in the corporate electronic documentation systems, make sure you comply with the time limits set by the systems. If you are going to be out of office for two or more days, delegate your authority to your fill-in colleague.

8.6.5. Creating a climate of cooperation and support

- If a colleague asks for your help, be responsive and helpful. Remember that one day you may need help too.
- If a colleague asks you a question that is not directly related to your job duties, help the inquirer find the right person.
- Do not forget to thank people who helped you.

8.7. Assets and resources of the Company

A responsible and careful handling and proper use of assets of the Company and the Group, as well as efficient consumption of resources is an important prerequisite for the Company's efficiency and stability, which in turn defines the welfare of its employees.

- Assets and resources of the Company or production facilities of the Group (including tools, equipment,

workwear, and means of communication) must only be used to perform your employment duties in line with applicable local regulations.

- Treat assets and resources the Company and production facilities of the Group with care and responsibility.
- Embezzlement of or damage to the Company's or the Group's property is unacceptable.
- Information is one of the most valuable resources. Employees must follow the rules of information handling specified in the corresponding section of this Code.

For more details, please see the Internal Labour Regulations, the Regulations on Access Control, the Regulations on Disciplinary Actions.

8.8. Privileged information

Careless handing of privileged information and its inconsiderate disclosure to third parties may cause a significant damage to the Company or the Group or their individual subdivisions and employees. Hence, Uralkali Group imposes restrictions on handling privileged information. Such restrictions help to maintain a reasonable balance between the openness of the Company and its commercial interests.

- Employees are not allowed to disclose privileged information to third parties without permission of the head of their subdivision except when required for their job duties.
- If an employee has access to insider or confidential information or commercial or state secrets by virtue of their position, they are obliged to handle such information in accordance with the applicable regulations.
- Employees are not allowed to disclose any information about activities of the Company's or production facilities of the Group to external media regardless of how such information will be provided. If a representative of the mass media requests a comment or an interview from you, such request should be forwarded to the PR Department.
- Employees are not allowed to transfer/disclose any information or the personal data of other employees of the Company to anyone (including personal mobile phone numbers, full names, positions in the Company, etc.)

For more details, please see the Regulations on the Information Policy, the Regulations on Media Announcements, the Internal Labour Regulations, The Regulations on the Protection of Commercial Secrets and Confidential Information, the Regulations on Processing and Protection of Personal Data.

8.9. Conflict of interest

A situation in which an employee is personally interested in actions which may harm the Company and/or the Group is called a conflict of interests. In such situations, employees must be governed by generally accepted principles of legality and ethics, and solely by interests of the Company and/or the Group when taking decisions on business-related issues.

- Employees should avoid transactions, situations or contractual provisions that may cause contradiction between their personal interests and the Company's and/or the Group's or be indicative of such conflict. If such situation cannot be avoided, then employees must inform their immediate supervisor accordingly.
- If your close relative holds an executive position with a company being a supplier of goods or services of Uralkali Group, you must not participate in taking decisions relating to business dealings with such company.
- The Company encourages your relatives or friends to join Uralkali Group. They will have to run through a job applicant screening process on the same basis as everyone else and will not have an exclusive advantage or special benefits over other candidates. The main criterion for their recruitment will be their professionalism and having the required qualifications for the job.
- Employees must not affect decisions involving promotion of their relatives employed by the Group or use their familial ties to affect other decisions.
- Relationships between the Company and stakeholders and outside audiences shall be based on the principles of legality, efficiency and fairness. Under no circumstances may an employee pay or receive payment for their or third parties' cooperation, pay fees or make or receive any other improper remuneration.
- Conflicts of interests related to gifts are described in the relevant section.

For more details, please see The Regulations on Conflict of Interests, the Internal Labour Regulations).

8.10. Business gifts

Receiving and giving business gifts and showing hospitality are symbols of respect and politeness. Gifts help create proper business relationships only if they are of nominal value and are not intended to affect decision-making or let other people suspect such effect.

- Taking and giving gifts may take place if it complies with business practices and if gifts are given without any expectation of any return favours in the current of future decision making related to an employee's duties and do not imply any obligations to a person who gives a gift.
- If an employee believes that a gift is attached to certain expectations with a counterparty or third party, the employee must inform his or her immediate supervisor.
- When dealing with representatives of state and municipal authorities, employees must strictly comply with legal regulations related to gifts and other types of remuneration.

For more details, please see the Regulations on Business Gifts.

8.11. Maintaining a corporate image and a trademark style

Every employee contributes to the corporate image of the Company and Uralkali Group in whole to a certain extent, and an employee's appearance, behaviour, ways of communication directly affect the outside audiences' perception of the Company and/or the Group.

- When dealing with representatives of stakeholders and outside audiences, employees must follow generally accepted standards of politeness and business ethics, as well as this Code.
- Employees must avoid actions and decisions that may harm the corporate image of the Company and/or the Group in one way or another. Such actions include, for instance, disrespectful statements about production facilities of Uralkali (including posts and comments on social media), improper behaviour at events where an employee represents the Company, or an employee's failure to fulfil his or her obligations etc.
- If you participate in meeting or public event with representatives of outside audiences, use corporate stationery, clothes and other products bearing the logo of Uralkali or your production facility, if available, or neutral no-name items. You are not allowed to use personalised products bearing logos of our competitors.
- Use approved letterheads for outgoing documents (available in Directum RX). For PowerPoint presentations, use the approved templates (available on the intranet portal).

8.12. Appearance and dress code

The dress code for business attire and employees' appearances reflect the corporate culture, support a business-friendly internal environment, and create a positive image in the eyes of stakeholders and outside audiences.

- When choosing clothing, hairstyle, makeup etc., remember three main rules: be moderate, neat and clean.
- If you are supposed to wear special workwear, make sure you look neat.
- If you are not supposed to wear special clothing, remember that it is unacceptable to wear sports or beach clothes or footwear, evening dresses or any other kind of clothing and footwear that do not conform with the generally accepted rules of business conduct.

8.13. Additional principles, standards and rules for executives

The Company expects that managers not only perform their office duties, but also adhere to the following additional principles, standards and rules.

In relation to his or her subordinates, a manager will:

- Make efforts and use best endeavours to ensure the safety of his or her subordinates and create comfortable working conditions;
- Respect rights and interests of subordinates, refrain from making derogatory statements and criticising subordinates with other people present;
- Provide subordinates with regular feedback (a justified opinion on their performance);

- Plan the subdivision's work, respect the time of subordinates and their right to personal life off work;
- Use a constructive dialogue to communicate possible concerns to subordinates, explaining what was done wrong and what should have been the right action;
- Be fair to subordinates, and evaluate them based on their performance rather than based on personal feelings;
- Timely communicate to subordinates any information necessary for the performance of their duties;
- Make possible for subordinates to share their views and ask questions;
- Encourage subordinates' initiatives and proposals, which may improve their performance or performance of their subdivision, the Company or the Group;
- Support subordinates' strive for professional and career growth and advancement and help them, inter alia, by delegation of authority;
- Set realistic timeframes for performing tasks, and help prioritise work;

In relation to the Company and the Group, a manager will:

- Personally demonstrate compliance with corporate values, principles, standards and rules specified herein, and encourage a similar behaviour from colleagues and subordinates;
- Maintain respect, trust and cooperation in his or her subdivision and at all levels of management in the Company and the Group;
- Discover new opportunities to increase efficiency of his or her subdivision (team);
- Be personally responsible for the performance of his or her subdivision (team) and its failures;
- Be responsible for the implementation of documents and decisions approved by him or her;
- Timely identify activity-related problems and take responsibility for solving them;
- Make balanced and reasonable decisions and consider their economic implications;
- Seek solutions that bring the highest benefit for the Company and the Group;
- Refrain from abusing their office or administrative resources;
- Refrain from making disrespectful statements about the Company and the Group;
- Help create a proactive attitude towards protecting the environment in his team.

9. Application of the Code

Every employee of the Company and other production facilities of the Group is responsible for compliance with this Code. Compliance with the principles, standards and rules of interaction and conduct is one of the criteria of employees' individual performance assessments.

Should you have any questions regarding the application of the Code or if you witness a breach of the provisions of the Code or a conflict of requirements between the Code and a local regulation of your subdivision, or if you are in doubt whether your conduct is in line with the Code, you can use the following points of contact:

- Your immediate supervisor;
- The Call Centre at +7-800-200-24-99, +7 (34 253) 6-24-99, or by e-mail at call-centre@uralkali.com;
- the Ethics Officers service at ethics@uralkali.com;
- The Q&A function on the intranet portal or Uralkali mobile app.

The Company has the right to ignore anonymous grievances. However, any informer is entitled to protect his/her identity and grievance contents. No employees will be prosecuted or punished for a grievance related to the compliance with this Code.