



PETROPAVLOVSK PLC

Freedom of Association Policy

Policy statement

Petropavlovsk PLC and its subsidiary companies (together 'Petropavlovsk' or 'the Group') respect human rights of its employees. As part of this commitment we adhere to the principle of the freedom of association and recognise the right of employee to collective bargaining.

Petropavlovsk operates in Russia, which has ratified International Labour Organisation's Convention No. 87 (Freedom of Association and Protection of the Right to Organise, 1948) and Convention No. 98 (Right to Organise and Collective Bargaining Convention, 1949). In accordance with the laws of the Russian Federation, all employees are free to join or not join a Trade Union. The legal framework as well as the Policy facilitate the Group's constructive engagement with employees on matters of mutual concern.

In accordance with this Policy and with relevant laws and regulations the Group:

- Officially recognises the right of our employees to the freedom of association, which refers to the right to join or create an employee organisation such as a trade union, a worker association, a worker council or committee for the promotion and defense of occupational interests of their choice, without negative consequences to them. This also includes the freedom not to be forced to join any of these groups;
- Shall not interfere in employee's decision whether to join an employee organisation and will not discriminate against the employee for their choice;
- Guarantees that procedures for hiring and termination must not discriminate against members of workers' association, trade union members, or those seeking to form a union;
- Recognizes that those workers who do not wish to join such organisations also have their rights protected.

Grievance and speak-up mechanisms are established in the Group to allow workers to raise any concerns and report complaints, including with regard to the Policy.

Scope of policy

This policy applies to all employees of The Group (whether permanent or temporary).

Responsibility for the Policy

The responsibility for overseeing the Policy's implementation is delegated to the Safety, Sustainability & Workforce Committee. On behalf of the Board of Petropavlovsk PLC it has overall responsibility for this Policy and for reviewing the effectiveness of actions taken in response to concerns raised under this policy.