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**APPROVED BY**  
**the Board of Directors of**  
**PJSC SIBUR Holding**  
**Minutes No. 252 dated 29 December 2021**

**SIBUR LLC AND PJSC SIBUR HOLDING ENTERPRISES**  
**DIVERSITY AND INCLUSION POLICY**

**(Revision No. 1)**

**Tobolsk**  
**2021**

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## **Article 1. General**

- 1.1. The Diversity and Inclusion Policy of SIBUR LLC and PJSC SIBUR Holding enterprises (the Policy) expresses the commitment of SIBUR LLC and PJSC SIBUR Holding enterprises (hereinafter, jointly referred to as SIBUR) to UN Sustainable Development Goals and the diversity and inclusion principles set out in the UN Global Compact;
- 1.2. SIBUR observes and promotes the diversity and inclusion (D&I) principles, acknowledges their importance and generality, shares confidence that diversity and inclusion contribute significantly towards the achievement of SIBUR's long-term development goals, facilitate the recruitment, training, and retention of talent, making of the most effective decisions, and enables prompter response to the dynamic changes in the external environment;
- 1.3. The Policy proves SIBUR's aspiration to promote diversity among employees at all levels, as well as inadmissibility of any form of discrimination;
- 1.4. SIBUR adheres to this Policy in its relationship with all stakeholders, and expects the latter to follow the highest ethical standards and withdraw from any activities which could be considered as violating such standards;
- 1.5. SIBUR promotes and supports the D&I principles beyond corporate culture through the integration of the values shared by SIBUR in the external community through its employees;
- 1.6. SIBUR welcomes the Policy circulation, adjustment and observation by a wide range of stakeholders.

## **Article 2. Terms and definitions**

- 2.1. ***Diversity*** (for the purpose of this Policy) means the multiple variations of different characteristics in a group of people: gender, age, race, place of birth, ethnic background, nationality, sexual orientation, religious and cultural beliefs, professional experience, track record, capabilities, and social status.
- 2.2. ***Inclusion*** (for the purpose of this Policy) is an element of corporate culture where the diverse and equal opportunities are manifested in respect for all stakeholders and recognition of uniqueness and potential of every partner and employee, which seeks to create conditions encouraging the unlocking of such potential, open sharing of ideas and nonexistence of socio-cultural barriers or prejudice.

## **Article 3. Diversity and Inclusion Principles in SIBUR**

- 3.1. ***Unity***: SIBUR's approach to D&I that reflects the understanding of the diversity value among all the stakeholders to achieve long-term effective development goals.
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- 3.2. **Equity:** decisions to hire, promote, reward, etc. of employees are made solely on the basis of their professional expertise and performance and may not be guided by any kind of prejudice.
- 3.3. **Equality:** SIBUR's business practice promotes equal opportunities across the entire employment lifecycle, where each employee enjoys a workplace environment free of harassment or prejudice of any kind.
- 3.4. **Personal Contribution:** each employee of SIBUR, regardless of position and professional expertise, contributes towards the development of equal opportunities and inclusion environment within SIBUR, and promotes SIBUR's values outside of the organization.

#### **Article 4. SIBUR's Commitments to Diversity and Inclusion**

- 4.1. Strictly adhere to the principles listed in Article 3, support and promote the diversity and inclusion culture at all levels of the organization seeking to create an environment free of prejudice of any kind and open for unobstructed sharing of ideas;
  - 4.2. Prevent any form of discrimination at the workplace because of different individual characteristics listed in clause 2.1 above;
  - 4.3. Recruit, develop and retain talent, being guided by the D&I principles, providing equal opportunities to employees in career advancement, training and development and ensuring decent working conditions and compensation regardless of individual characteristics;
  - 4.4. Recognize commitment to form diverse teams and reward diversity-related initiatives;
  - 4.5. Build long-term cooperative and partner relationships within SIBUR and with all the stakeholders based on the basis of respect, trust, honesty, equity and equal opportunities;
  - 4.6. Engage with partners compliant with the Code of Corporate Ethics for Counterparties of SIBUR LLC and PJSC SIBUR Holding enterprises;
  - 4.7. Nominate candidates to the Board of Directors and senior and mid-level management positions based on their competence and professional experience, which ensures a broader range of diverse skills and expertise required to make the most efficient decisions;
  - 4.8. Adhere to the principles of decent and transparent business, incorporate diversity, inclusion and social responsibility in operations, abide by the effective legislation with due diligence, pay particular attention to human rights, occupational health and industrial safety;
  - 4.9. Carry out continuous monitoring, establish and adopt the best practices of diversity and inclusion.
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### **Article 5. Tools to Support Diversity and Inclusion**

- 5.1. Communicate the D&I Policy to all the employees and stakeholders, in particular, through publications in open sources;
- 5.2. Maintain a continuous dialog with employees to implement a framework of system-level and inclusion performance improvement;
- 5.3. Incorporate the D&I goals in SIBUR's Sustainable Development Strategy;
- 5.4. Develop and implement a set of D&I actions;
- 5.5. Have preventive measures in place to rule out discrimination at the recruitment stage for all positions, including management;
- 5.6. Develop the mentorship program;
- 5.7. Implement and develop new corporate volunteer practices;
- 5.8. Report on D&I performance and activities;
- 5.9. Deliver D&I training for all stakeholders;
- 5.10. Inform all stakeholders of SIBUR's Hotline available for reporting potential or actual violations of D&I principles; review all the cases reported to the Hotline on a timely and equitable basis;
- 5.11. Monitor changes in law and standards affecting D&I to support this Policy update;
- 5.12. Have a designated collective body to evaluate the current D&I landscape on a regular basis.

### **Article 6. Responsibilities of Executives Associated with Diversity and Inclusion**

- 6.1. The individuals holding executive positions in SIBUR are the role models of ethical behavior, compliance with the principles and responsibilities set out in SIBUR's in-house regulations and this Policy who fully support the development of the D&I culture;
- 6.2. In their management role, executives at all levels shall treat employees with respect, observe their rights, avoid any actions that would impair the dignity of an individual, and make lawful and ethically justified decisions;
- 6.3. The executives shall take all necessary actions to prevent the D&I conflicts; where any such conflict is identified, the executives shall facilitate its prompt, transparent and equitable resolution.

### **Article 7. Responsibilities of Employees Associated with Diversity and Inclusion**

- 7.1. All the employees, regardless of their position, shall support the development of the D&I environment among their coworkers;
  - 7.2. The high standards of business conduct of SIBUR's employees imply the absence of any cultural barriers or social prejudice.
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### **Article 8. Compliance**

- 8.1. The responsibility to comply with this Policy shall be borne by all the employees of SIBUR;
- 8.2. SIBUR shall implement in-house policies and procedures governing employee conduct in line with the D&I principles in accordance with this Policy;
- 8.3. SIBUR shall take prompt action to prevent and remediate any human rights violations where such violations are identified;
- 8.4. Where a human rights violation occurs, all SIBUR's employees and stakeholders shall have the right to privately and anonymously (optional) report it to the Hotline at: [compliance@sibur.ru](mailto:compliance@sibur.ru);
- 8.5. The Ethics and Discipline Committees in PJSC SIBUR Holding enterprises and the Ethics and Discipline Committee in PJSC SIBUR LLC, the Management Organization of PJSC SIBUR Holding, shall be responsible for addressing and resolving the D&I issues and conflicts.

### **Article 9. Final Provisions**

- 9.1. This Policy shall be construed in conjunction with the principles set out in the following documents:
    - 9.1.1. Code of Corporate Ethics of SIBUR LLC and PJSC SIBUR Holding Enterprises;
    - 9.1.2. Human Rights Policy of SIBUR LLC and PJSC SIBUR Holding Enterprises;
    - 9.1.3. Compliance Policy of SIBUR LLC and PJSC SIBUR Holding Enterprises;
    - 9.1.4. Social Investment Policy of SIBUR LLC and PJSC SIBUR Holding Enterprises;
    - 9.1.5. Code of Corporate Ethics for Counterparties of SIBUR LLC and PJSC SIBUR Holding Enterprises.
  - 9.2. This Policy shall be subject to regular revision to ensure alignment with the international human rights standards and the corresponding provisions of the Russian and international laws;
  - 9.3. Any changes, additions, amendments hereto shall be subject to the approval of PJSC SIBUR Holding Board of Directors.
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