

HOTLINE CHANNELS:



Compliance team e-mail:
compliance@nlmk.com

Via external provider B1:
nlmk.hotline@b1.ru



Toll-free phone
8-800-234-35-03



Contact form at the official website:
<https://nlmk.com/ru/sustainability/anticorruption/independent-direct-compliance-line/>

Contact form at the corporate portal:
<https://nlmk.one/about/company/acorup/>



[@nlmk_hotline_bot](#)

WHO CAN CONTACT:

- Any employee of NLMK Group company
- Any business partner of NLMK Group company
- Any other person or entity with information about a potential violation

WHAT TO REPORT:

- Fraud, corruption or any other malpractice by an employee or a business partner of NLMK Group
- Violations (including potential ones) of competition law requirements
- Any other violation of the laws applicable to NLMK Group, as well as of the business ethics set forth in NLMK Group's Code of Conduct.

REPORT CONTENT:

Please, provide fully but briefly all the information that will assist us in conducting further verification. This information affects the timing and outcome of the application processing:

- Overview of the incident
- Time and place the incident occurred (if possible, please, state the division, address, date and time, persons involved)
- Circumstances under which you became aware of the incident
- Evidence (if available) supporting information in the report (documents, full names of persons involved, contact details, correspondence, photos, etc.)
- Other additional information you would like to share.

REPORT ANONYMITY:

When you contact the Compliance Hotline, you have the right to remain anonymous and not state your name. Keeping reports anonymous is an important function of the compliance team. However, if you provide your contact details (e.g. your contact e-mail), we will be able to update you on the status of your report processing or to request additional information. This will help to carry out a full, objective and timely investigation of your report.

PROTECTION AGAINST HARASSMENT:

Anyone who reported the breach in good faith will be given protection against any form of pressure, harassment, discrimination. This is an important principle of NLMK Group and the responsibility of the compliance team.

CONFIDENTIALITY GUARANTEES:

The identity of the person who has reported a breach in good faith is guaranteed to remain confidential.

➤ Report registration period:

- Within 24 hours, a report is registered into the information system, which automatically tracks the timing of the report processing.
- No report will be overlooked. Each report is assigned with a status that is monitored and updated from the time it is received until it is closed.

➤ Report processing period:

- The responsible persons and the investigation activities are determined within 3 days

➤ Period for validating reported violation and developing settlement activities:

- In accordance with the Regulations on Official Investigations and Audits

Reports will not be reviewed if they:

- are promotional or entertaining;
- contain offers to purchase goods or participate in biddings held by other companies;
- contain a request for purchase of NLMK Group products (such requests shall be sent to store@nlmk.com).

False Information / Defamation:

- Reporting knowingly false information to the Compliance Hot Line or non-disclosure of a corruption attempt or any other information mandatory for disclosure under the Anti-Corruption Policy is a violation of the Policy and, if available, the applicable law. A person who has provided knowingly false information that defames another person or damages his or her reputation may be liable for defamation under applicable law.

➤ FEEDBACK:

- The response to the report shall be provided within 2 working days of receipt of the investigation/review results to the extent not contrary to the corporate requirements to the confidential data privacy.
- The form of response depends on the report content and the contact details provided for feedback.

If you have any questions about the compliance hotline, or if you want to report a violation in a personal message, you can always contact the compliance team:

- Nadezhda Zotova
zotova_na@nlmk.com

- Igor Matsak
matsak_ia@nlmk.com