



**APPROVED**

CEO of PAO TMK

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## **EMPLOYEE VOLUNTEERING POLICY**

Reg. No. ND-0335/2021/0  
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Contents

- 1. Key terms and definitions ..... 3
- 2. General..... 3
- 3. Goals and principles of employee volunteering..... 3
- 4. Procedure for authorizing engagement in volunteer activities ..... 4
- 5. The Company’s priorities regarding support for employee volunteering... 5
- 6. Resources for organizing employee volunteer initiatives ..... 5
- 7. Evaluating the impact of volunteer projects..... 6

## **1. Key terms and definitions**

- 1.1. The following terms and definitions are used for the purposes of this Policy:
- Employee volunteering – providing assistance without expecting any form of financial or other similar remuneration.
  - Stakeholders – individuals or legal entities with interests, rights, or claims related to employee volunteering.
  - Employee volunteers – individuals who are employees of the Company (PAO TMK, hereinafter the “Company”), non-working retirees of the Company, or their family members.

## **2. General**

2.1. This Policy outlines the objectives and principles of employee volunteering within the Company and the nature of relationships between all stakeholders involved in volunteering, and is applicable to the activities of employee volunteers.

2.2. This Policy is developed in compliance with applicable Russian laws, other regulations, and the internal documents of the Company and shall not be in conflict therewith:

2.2.1. Federal Law No. 7-FZ, On Non-profit Organizations, dated January 12, 1996.

2.2.2. Federal Law No. 135-FZ, On Charitable Activities and Volunteering, dated August 11, 1995.

2.3. This Employee Volunteering Policy serves as a framework governing the interactions between employee volunteers and stakeholders and facilitating the ongoing planning and implementation of volunteer activities, including those supporting the Company’s operations.

2.4. Employee volunteering includes exclusively voluntary non-profit activities.

2.5. The Sinara Charitable Foundation is responsible for managing the Company’s employee volunteering.

2.6. The Executive Directorate of the Sinara Charitable Foundation coordinates the Company’s employee volunteering efforts as instructed by the Foundation’s Management Board, the highest collective governing body.

2.7. Each Company enterprise has a local volunteer supervisor.

2.8. Employee volunteering is limited to non-working hours.

2.9. The employer endorses volunteer undertakings at the workplace and may initiate employee volunteering activities during working hours if they cannot be performed off working hours (see Clause 4.4.).

## **3. Goals and principles of employee volunteering**

3.1. The Company strictly adheres to the principles of Environmental, Social, and Corporate Governance (ESG) in its employee volunteering endeavors, guiding the volunteer movement and employee volunteers toward a broad array of tasks, including:

- environmental protection
- addressing social issues concerning its employees and other citizens

- fostering zero tolerance for corruption
  - preventing racial and gender discrimination.
- 3.2. Employee volunteering primarily focuses on:
- reinforcing corporate culture, fostering a culture of active voluntary engagement by Company employees in social problem solving
  - driving the professional and personal employee development through involvement in volunteer activities
  - introducing non-monetary incentives for employees who actively engage in volunteering
  - contributing to stronger Company performance and a better manufacturing culture by fostering horizontal connections between employees and the Company's units
  - improving the quality of life across the Company's regions of operation by addressing pressing social issues
  - strengthening the Company's reputation as a socially responsible entity.
- 3.3. Employee volunteering at the Company is guided by the following principles:
- Voluntariness – participation of Company employees in our volunteer activities is a personal and informed choice. Any form of coercion for volunteer work is deemed inappropriate
  - Gratuitousness – engagement in employee volunteering does not involve monetary remuneration
  - Openness – information on the Company's volunteer activities is readily available and comprehensive
  - Integrity – any false statements or misrepresentation of details related to employee volunteering and meant for Company employees or external stakeholders is unacceptable
  - Responsibility – at volunteering events, employee volunteers shall adhere to applicable Russian laws and corporate ethics guidelines
  - Consistency – employee volunteering is an integral part of the Company's social policy, which should be implemented and updated with a focus on a common achievable goal, drawing on well-structured links between all volunteering stakeholders, and a pool of tangible and intangible resources
  - Social significance – corporate volunteer initiatives have a positive impact across the entire society and enhance the quality of life in all of our operating regions

#### **4. Procedure for authorizing engagement in volunteer activities**

- 4.1. An employee voluntarily chooses an employee volunteering event they wish to join.
- 4.2. Managers shall help employees take part in volunteering, including by taking all steps required to settle any matters that may arise in order to prevent risks of non-compliance with labor laws should the volunteer event take place during working hours.

4.3. Employees may not engage in any volunteer event during working hours unless authorized to do so by their immediate supervisor.

4.4. Employees may suggest new volunteer activities and additional non-profit organizations to partner with.

## **5. The Company's priorities regarding support for employee volunteering**

5.1. The Company outlines the following priority focus areas for volunteer work:

- Social (supporting children and the elderly)
- Ecology, environmental protection
- Education, mentoring
- Healthy lifestyle
- Cultural and historical heritage

5.2. The Company promotes employee volunteering through a range of measures:

5.2.1. Hosting events to share volunteer project success stories.

5.2.2. Providing training to involve Company employees in volunteer activities.

5.2.3. Setting up special meetings on employee volunteering for top and middle managers to meet with the Company's employees and encourage them to engage in volunteer events.

5.2.4. Ensuring informational support for volunteer events and keeping employees informed on a regular basis about volunteering opportunities by communicating information on volunteer events and initiatives via the dedicated section of the Mobi2U corporate mobile app, corporate media, and targeted e-mailing.

5.2.5. Setting up internal volunteer competitions within the Company.

## **6. Resources for organizing employee volunteer initiatives**

6.1. As employee volunteering initiatives are implemented on a voluntary pro bono basis, they rely on a pool of tangible and intangible resources.

6.2. Tangible resources encompass:

6.2.1. Financial resources allocated by the Company to promote employee volunteering within its budget.

6.2.2. Premises, machinery, equipment, consumables, and other resources owned by the Company, its employees, or representatives of stakeholders such as government bodies (including specific institutions), for-profit and non-profit organizations, charitable foundations, and individuals.

6.3. Intangible resources:

6.3.1. Ideas, projects, time, connections, competencies, and initiatives of the Company's employees.

6.3.2. Support of federal and regional government bodies manifested in diverse intangible forms.

6.3.3. Assistance from experts spanning different professional domains and offering their expertise on a pro bono basis.

6.3.4. Free lease of premises, equipment, or other resources made available by stakeholders.

6.3.5. Informational support for employee volunteer events through the media, including corporate communications.

## **7. Evaluating the impact of volunteer projects**

7.1. To evaluate the performance of employee volunteer initiatives:

7.1.1. Methods to evaluate the performance of such initiatives are developed.

7.1.2. Key performance indicators of such initiatives are determined.

7.2. The procedure and mechanism for determining the evaluation criteria are outlined in a standalone internal regulation.

7.3. Employees who excel in volunteering activities, all else being equal, may receive preferential consideration for vacancies within the Company.