



APPROVED
by Resolution of PAO TMK's Board of Directors
April 18, 2024
(Minutes No. 30 dated April 18, 2024)

SUSTAINABILITY POLICY

Version 2

Moscow, 2024

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1. General

1.1 Document details

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| Developed by | E.V. Devyatkina Deputy Head of Sustainability |
| Regulated area | Sustainable development |
| Purpose/Aim of document | To set the overall principles and focus areas in sustainability |
| Enacted | To replace the previous Sustainability Policy approved by PAO TMK's Board of Directors on November 11, 2021, Minutes No. 12 |
| Overseen by | Deputy CEO for Marketing |
| Updated by | Deputy Head of Sustainability |
| Scope | PAO TMK, TMK Group enterprises |

1.2 Normative references

| Document type, number, and date | Document title |
|---|--|
| Constitution, Russian Federation, dated December 12, 1993, as amended on July 01, 2020 | Constitution of the Russian Federation |
| Code, Russian Federation, dated December 30, 2001, No. 197-FZ (as amended on January 30, 2024) | Labor Code of the Russian Federation |
| Global Compact, UN, 2000 | UN Global Compact |
| Declaration, UN, 1948 | Universal Declaration of Human Rights |
| Convention, UN, 1989 | Convention on the Rights of the Child |
| Declaration, ILO, 1998 | International Labour Organization Declaration on Fundamental Principles and Rights at Work |
| Convention, ILO, 1930 | Forced Labor Convention, No. 29 |
| Convention, ILO, 1948 | Freedom of Association and Protection of the Right to Organize Convention, No. 87 |
| Convention, ILO, 1949 | Right to Organise and Collective Bargaining Convention, No. 98 |
| Convention, ILO, 1951 | Equal Remuneration Convention, No. 100 |
| Convention, ILO, 1957 | Abolition of Forced Labor Convention, No. 105 |
| Convention, ILO, 1958 | Discrimination (Employment and Occupation) Convention, No. 111 |
| Convention, ILO, 1973 | Minimum Age Convention, No. 138 |

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| Convention, ILO, 1999 | Worst Forms of Child Labor Convention, No. 182 |
| Code, Bank of Russia, 2014 | Corporate Governance Code |
| Code dated February 28, 2011 | PAO TMK's Corporate Governance Code |
| Code dated February 08, 2019 | TMK Group's Code of Ethics |
| Policy, No. ND-0353/2022/0, dated May 17, 2022 | TMK Group's Counterparty Management Policy |
| Policy dated October 07, 2019 | PAO TMK's Policy on Social Investment, Charitable and Sponsorship Activities |
| Policy, No. ND-0335/2021/0, dated June 23, 2021 | Employee Volunteering Policy |
| Policy dated December 30, 2021 | TMK Group's Environmental Policy |
| Policy dated March 18, 2021 | PAO TMK's Industrial Safety Policy |
| Policy dated March 18, 2021 | Occupational Health and Safety Policy |
| Policy, No. ND-0358/2020/0, dated May 24, 2022 | PAO TMK's Anti-corruption Policy |
| Policy dated December 17, 2020 | TMK Group's Risk Management Policy |
| Policy, No. ND-0342/2021/0, dated November 18, 2021 | PAO TMK's Anti-trust Compliance Policy |
| Regulations, No. ND-0239/2019/1, dated May 13, 2019 | Regulations on Conflicts of Interest |
| Regulations, No. ND-0214/2018/1, dated December 19, 2018 | Regulations on PAO TMK's Charity (Endowment, Donation) Policy |

1.3 Terms, definitions, codes, and abbreviations

| Terms and definitions | |
|--------------------------|--|
| Term | Definition |
| Discrimination | Any distinction, exclusion, restriction, or bias in terms of rights based on any ground, including race, color, gender, language, religion, political or other opinion, or ethnic or social origin, aimed at, and/or resulting in, elimination or impairment of the recognition, enjoyment, or exercise of human rights and fundamental freedoms on an equal basis |
| Environment | The natural environment in which the Company operates, including land, subsoil, soils, surface water and groundwater, atmospheric air, flora, fauna, and other organisms as well as the Earth's atmosphere and near space, and their interrelations |
| Human rights | Rights inherent to all human beings, whatever their nationality, place of residence, gender, ethnic origin, color, religion, language, or any other status. All people are equally entitled to human rights without discrimination. These rights are all interrelated, interdependent, and indivisible |
| Inclusivity | A social diversity concept assuming that any person restricted in terms of health or in their life activities on the whole should be included in society and have opportunities for self-fulfillment, training, work, and high-quality life |
| Local communities | Communities living in the areas where the Company operates |

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| Regions of operation | Areas in which the Company operates and affects the local economy |
| Stakeholders | Individuals and legal entities or groups of persons who affect the performance of, and/or are affected by, the Company |
| Sustainability (non-financial) risks | Environmental, social, and governance risks that may fall outside the classical risk management matrix, thus requiring a separate analysis, assessment, and integration into the unified corporate risk management system |
| Sustainable development | A concept of global development that meets the needs of the present without compromising the ability of future generations to meet their own needs |
| TMK Group | A combination of interrelated enterprises united by a common management system, business processes, strategy, and goals |
| UN Global Compact | The United Nations Global Compact is a voluntary initiative to drive social responsibility of business, forming a basis for the business community committed to the Compact's ten principles on human rights, environment, labor, and anti-corruption |
| Codes and abbreviations | |
| Abbreviation/code | Explanation |
| BAT | Best available technology |
| ISO | International Organization for Standardization |
| KPIs | Key performance indicators |
| NPO | Non-profit organization |
| OHS | Occupational health and safety |
| PAO | Public joint stock company |
| UN | United Nations Organization |
| UN SDGs | United Nations Sustainable Development Goals |

1.4 Purpose and scope

1.4.1 The Sustainability Policy (the “Policy”) is a fundamental public document of PAO TMK (the “Company”), reflecting the Company’s position with regard to sustainable business development and driving a uniform approach to sustainability across TMK Group.

1.4.2 The Policy takes into account the Company’s other internal regulations governing various aspects related to sustainability.

1.4.3 This Policy outlines the Company’s sustainability goals, objectives, principles, and key focus areas.

1.4.4 The Policy has been developed in accordance with Russian laws and applicable national laws of other countries where the Company operates as well as international laws, standards, recommendations, and initiatives on sustainability.

1.4.5 The Policy and its provisions apply to all enterprises and organizational units of the Company and are binding on them starting from the date of the resolution to approve the Policy in accordance with their Articles of Association.

1.4.6 The Policy is a permanent internal document of the Company.

1.4.7 PAO TMK’s Management Board is responsible for monitoring and ensuring the compliance with this Policy.

2. The Company’s sustainability goals and principles

2.1 Compliance with Russian and international regulations

2.1.1 The Company operates in strict compliance with the requirements of applicable Russian laws and the laws of other countries of operation, following laws and regulations in all jurisdictions in which it operates.

2.1.2 The Company also voluntarily aligns its policies with the principles and provisions of international sustainability documents (declarations, conventions, resolutions, etc.).

2.2 Ethical conduct

2.2.1 The Company aims for high standards of business ethics and is guided by integrity, honesty, and openness when conducting its business and engaging with stakeholders.

2.2.2 To build the basic values and ethical principles of its corporate culture, the Company adopts ethical conduct standards while encouraging and promoting compliance with these standards by its employees, suppliers, and contractors. To this end, the Company has approved and applies TMK Group’s Code of Ethics. On top of this, the Company’s commitment to ethical conduct standards and expectations of a similar approach from partners are outlined in TMK Group’s Counterparty Management Policy and Sustainability Policy.

2.2.3 The Company’s core values and ethical principles include:

- legality;
- customer focus;
- efficiency;
- safety and security;
- respect;
- openness.

2.3 Human rights

2.3.1 The Company maintains and is committed to human rights and freedoms safeguards, supports inclusion and fair treatment of all people, recognizes the right to freedom of thought, conscience, and speech, and promotes a culture of open multilateral dialogue with all stakeholders.

2.3.2 The Company seeks to provide equal opportunities for all employees to unlock their potential through cultural diversity and gender, racial, and other equality, and is committed to:

- preventing child labor;
- preventing forced or compulsory labor and upholding a zero-tolerance policy for any form of slavery;
- no discrimination on any grounds;

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- providing safe work conditions for employees, creating a favorable working environment;
- enabling freedom of association and collective bargaining;
- protecting privacy;
- ensuring confidentiality of personal data;
- protecting fundamental human rights and freedoms;
- preventing violation of local community rights;
- aspiring to create an inclusive society and a culture of diversity;
- protecting human rights in emergencies and during epidemics.

2.3.3 The Company’s commitment to human rights is driven by Russian laws, primarily the Constitution of the Russian Federation, which provides that man, his rights and freedoms shall be the supreme value. On top of this, the Company, as an employer, complies with the provisions of the Labor Code of the Russian Federation, which outlines labor rights and freedoms. The Company also takes into account the provisions of international documents, including the Universal Declaration of Human Rights, the UN Global Compact, the ILO Declaration on Fundamental Principles and Rights at Work, and ILO Conventions Nos. 29, 87, 98, 100, 105, 111, 138, and 182 as well as the UN Convention on the Rights of the Child and other applicable documents.

2.4 Implementation of best practices in corporate governance

2.4.1 The Company is committed to building and implementing a governance system that facilitates asset protection and the long-term success while safeguarding the interests of all shareholders and taking into account and balancing the interests of all stakeholders.

2.4.2 The Company’s corporate governance is primarily aligned with Russian laws, reflecting sustainability factors as well as requirements and recommendations of regulators in the countries in which it operates and leveraging industry best practices.

2.4.3 In building its corporate governance system, the Company is guided, but not limited, by the following external and internal regulations:

- laws of the Russian Federation;
- laws of other countries in which the Company operates;
- listing rules;
- Corporate Governance Code recommended by the Bank of Russia;
- OAO TMK’s Corporate Governance Code;
- TMK Group’s Code of Ethics.

2.5 Sustainability risk management

2.5.1 The Company aims to continuously improve the performance of its existing risk management and integrate sustainability risks into its corporate risk management procedures.

2.5.2 The Company’s risk management aims to continuously identify and assess risks at the Company’s different organizational levels (across organizational units and business processes) while implementing a range of regular risk management initiatives and identifying their links to the Company’s management processes.

2.5.3 The Company applies a systematic approach to risk management and recognizes the need for high-quality risk management to drive business sustainability and achieve strong economic performance. Risk management and internal control systems are fully integrated into the Company’s business strategy.

2.5.4 The Company’s sustainability risk management efforts reflect the socio-economic, geographical, and cultural profiles of its regions of operation.

2.5.5 The Company’s risk management is guided by, but not limited to, the following internal documents:

- TMK Group’s Risk Management Policy;
- TMK Group’s Code of Ethics;
- PAO TMK’s Anti-trust Compliance Policy;
- Regulations on Conflicts of Interest;
- Regulations on PAO TMK’s Charity (Endowment, Donation) Policy;
- OAO TMK’s Corporate Governance Code.

2.6 Effective stakeholder engagement

2.6.1 When engaging with stakeholders, the Company seeks to balance interests and build dialogue

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and cooperation based on mutual respect, partnership, and integrity. Stakeholder engagement is driven by our long-term priority of creating value, including economic value, for a wide range of stakeholders.

2.6.2 The Company respects the rights of stakeholders and takes into account their interests. The Company responds promptly to stakeholder questions and concerns.

2.6.3 In its stakeholder engagement, the Company is guided, but not limited, by the following internal regulations:

- Sustainability Policy;
- TMK Group’s Code of Ethics;
- TMK Group’s Counterparty Management Policy;
- Employee Volunteering Policy.

2.7 Responsible supply chain

2.7.1 The Company is committed to promoting the adoption of sustainability principles throughout its value chain. The Company deems it important that its suppliers meet high standards in environmental and social performance, corporate governance, and business ethics.

2.7.2 The Company also takes all necessary measures to comply with the sustainability standards and requirements of its customers. The Company avoids partnering with counterparties who systematically breach environmental or social laws, have high corruption risks, or violate human rights.

2.7.3 Sustainability principles that underlie the Company’s efforts to build its supply chain are as follows:

- fair and competitive process for own procurement and the Company’s participation in the procurement procedures run by other organizations;
- preventing and combating corruption in all its forms across the supply chain and timely identifying and managing conflicts of interest;
- ensuring occupational health and safety, promoting employees’ health throughout the supply chain;
- commitment to minimizing environmental footprint, ensuring environmental safety;
- protecting human rights and generally accepted ethical standards throughout the supply chain;
- promoting dialogue with partners (customers and suppliers) and ensuring equal discussion of any problems, differences, and conflicts;
- ensuring timely remuneration and fair treatment of all employees;
- promoting dialogue with local communities and taking their interests into account when conducting operations as well the efforts to develop the Company’s regions of operation and boost their prosperity.

2.8 Commitment to the United Nations Sustainable Development Goals

2.8.1 The Company reiterates its commitment to the UN Sustainable Development Goals (UN SDGs) adopted in 2015, which provide a framework for aligning the efforts of governments, businesses, and civil society to address the most urgent problems facing humanity. TMK also supports the ten core principles of the UN Global Compact.

2.8.2 The Company selects its priority UN SDGs in line with its industry and operational profile and strives to contribute toward these goals.

3. Key focus areas of the Company’s sustainability efforts

3.1 Environmental protection

3.1.1 The Company’s strategic goals include minimizing environmental footprint and promoting resource stewardship while preserving and improving the environment in its regions of operation in the context of dynamically growing production. The Company is aware of its responsibility for the potential impact of its business, its operations in particular, on the environment and the health of people living in its regions of operation. Since the Company sees environmental responsibility as a key priority, along with ensuring environmentally safe operations it also develops and implements measures to prevent negative implications for the environment and consistently reduce its overall environmental impact.

3.1.2 The Company’s priorities in environmental protection include:

- waste management and resource efficiency;

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- water impact mitigation;
- reduction of air emissions;
- environmental safety across operations.

3.1.3 Other environmental aspects identified as important by the Company include reduction of negative impact on soil, remediation of disturbed lands, regulation of physical (noise) impact, and biodiversity conservation.

3.1.4 The Company has developed and approved TMK Group’s Environmental Policy and TMK Group’s Environmental Policy Implementation Framework, which set out the Company’s approach to, and priorities in, achieving high levels of environmental safety and minimizing its environmental footprint. To plan efforts to reduce its environmental footprint, the Company develops and implements environmental programs addressing its impacts, which contain specific measures to protect air and water as well as manage waste.

3.1.5 In order to achieve its goals, the Company implements a set of environmental measures:

- conducts its operations in compliance with legal requirements around environmental protection and environmental safety;
- improves the environmental management system;
- sustainably uses and saves resources and energy across all stages of the production process;
- applies a risk-based approach to environmental management;
- ensures the adoption of best available technology (BAT);
- reviews environmental risks and aims to minimize negative environmental impact when planning and implementing investment projects;
- takes into account the interests of local communities and engages in dialogue with them about implementing major investment projects related to the construction of industrial facilities;
- provides free access to environmentally relevant information and guarantees environmental transparency.

3.2 Climate action

3.2.1 The Company acknowledges the significance of climate-related impacts and strives to reduce the carbon footprint of its products so as to contribute toward the global carbon neutrality goal.

3.2.2 The Company’s climate action priorities include:

- decarbonization journey;
- low-carbon energy and energy efficiency.

3.2.3 To plan its climate action efforts, the Company develops and implements greenhouse gas (GHG) emissions reduction programs.

3.2.4 The Company’s climate action efforts include:

- identifying climate risks and developing plans to manage them;
- setting up a system for monitoring and managing GHG emissions at Company enterprises;
- exploring potential GHG emissions reduction opportunities, including new and high-potential technologies and solutions in this area;
- embedding best practices in energy efficiency and GHG emissions reduction into operating processes;
- contributing to the decarbonization agenda through business, including by developing low-carbon products and tubular solutions to produce and transport hydrogen.

3.3 Occupational health and safety

3.3.1 Ensuring occupational health and safety (OHS) is a key focus area in our sustainability efforts. The Company recognizes the priority of human life and health over any operational or economic gains. The Company shares the commitment of responsible business to zero fatalities and makes every effort to achieve this target.

3.3.2 The Company’s priorities in occupational health and safety include:

- reduction of injury rates;
- improvement of the OHS management system.

3.3.3 The Company also places a significant emphasis on mitigating the risk of emergencies, accidents, and incidents at hazardous production facilities and ensuring preparedness for emergency

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containment and response. Additionally, the Company undertakes further commitments to ensure access by employees to healthcare services and runs employee healthcare programs.

3.3.4 Our OHS efforts are outlined in PAO TMK’s Occupational Health and Safety Policy and PAO TMK’s Industrial Safety Policy.

3.3.5 The Company continuously implements measures and initiatives to achieve its occupational health and safety goals and objectives, including through:

- building an OHS management system based on commonly accepted OHS management system standards (GOST R ISO 45001-2020, ISO 45001:2018);
- creating and maintaining safe and comfortable work conditions for employees;
- adopting and implementing best practices in OHS;
- continuously upskilling its employees and training them in OHS.

3.4 Human capital development

3.4.1 In HR management, the Company embraces the principle that all people are equal, eliminating any potential discrimination on any ground, during both recruitment and further interaction between the Company as an employer and its employees. The Company ensures that its employees are provided with decent work conditions and social support, and places a strong focus on employee training and development.

3.4.2 The Company’s priorities in human capital development include:

- respect for human rights and non-discrimination;
- boosting employee engagement;
- talent attraction and retention;
- employee training and development.

3.4.3 In HR management and when building its relations with employees, the Company is primarily guided by the Russian Labor Code, which provides for the equality of all people in terms of labor rights. The Company has developed and is implementing an HR Strategy defining:

- corporate HR management principles;
- corporate values;
- strategic HR initiatives;
- key focus areas and objectives;
- corporate HR management KPIs.

3.4.4 The Company is an attractive and reliable employer thanks to its consistent efforts in this area and the implementation of a large number of human capital development initiatives and programs, including:

- offering decent work, competitive salaries, and incentive programs;
- employee development and training programs;
- talent attraction and retention;
- social and healthcare programs;
- developing a corporate culture and increasing employee engagement;
- career guidance.

3.5 Developing the regions of operation

3.5.1 The Company actively implements and supports programs contributing to the social and economic development of the regions in which it operates. The Company pursues a consistent regional policy based on the principles of responsibility for the social and economic situation in relevant regions while providing employment and improving living standards for local communities across its regions of operation.

3.5.2 The Company’s priorities in local community development include:

- social investment and infrastructure development;
- social projects and charity.

3.5.3 The Company maintains charitable traditions, seeking to create a comfortable social environment for people. The Company pursues its charity projects through its corporate Sinara Charitable Foundation, a professional operator, and other charities. In addition, each enterprise within TMK Group runs its own social-impact projects across regions to respond to requests from stakeholders (local residents, municipal administrations, and social infrastructure facilities). The Company’s efforts in this area are guided by PAO TMK’s Policy on Social Investment, Charitable and Sponsorship Activities and the Regulations on

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PAO TMK’s Charity (Endowment, Donation) Policy.

3.5.4 The Company continuously runs social-impact initiatives in healthcare, education, culture, and sports across its regions of operation, including:

- providing targeted material support;
- purchasing inventories (medical or other equipment, medicines, sports tools, learning aids, etc.);
- organizing training and research, running career guidance initiatives;
- holding grant competitions for non-profit organizations to finance social-impact projects of the winners;
- developing infrastructure projects for the construction, retrofit, and repair of buildings, area improvements, road building, and preservation of historical and cultural heritage sites;
- developing industrial tourism across Company enterprises;
- organizing charity campaigns across Company enterprises;
- supporting local people’s initiatives and training volunteers in social design skills;
- supporting landmark initiatives across regions, including in sports, education, and culture;
- organising the employee volunteer movement.

3.6 Business development and economic value creation

3.6.1 The Company’s business is aimed at long-term economic growth not only for its shareholders but also for the regions in which it operates, including, in particular, improving the well-being and the quality of life of local communities. In implementing its development strategy, the Company is guided by the long-term priority of creating economic value for all stakeholders.

3.6.2 In terms of sustainability, the Company’s priorities in business development and economic value creation include:

- development of governing bodies;
- sustainable supply chain.

3.6.3 The Company builds a sustainable supply chain to incorporate sustainability principles and standards into the activities of its suppliers and ensure compliance of the Company with customer sustainability requirements and standards. Key documents that govern the Company’s efforts in this area include TMK Group’s Counterparty Management Policy, Sustainability Policy, and TMK Group’s Code of Ethics.

3.6.4 To drive business development and economic value creation in terms of sustainability, the Company:

- carries out its activities in line with current sustainability requirements and trends;
- streamlines its corporate governance structure;
- explores sustainable and green financing instruments;
- integrates sustainability metrics into senior management’s key performance indicators (KPIs), linking remuneration to their achievement;
- consistently implements its own corporate procedures aimed at establishing high sustainability standards throughout the supply chain;
- assesses its suppliers for compliance with the Company’s sustainability requirements;
- is willing to offer assistance and information support to suppliers in implementing sustainability principles and standards.

3.7 Business ethics

3.7.1 The Company’s business ethics efforts focus on ensuring that the Company’s activities meet the highest standards and principles of business conduct as well as on combating corruption and managing compliance risks.

3.7.2 The Company’s priorities in business ethics include:

- anti-corruption, compliance, and ethics.

3.7.3 TMK Group’s Code of Ethics is the Company’s key internal document on business ethics, which is communicated to all employees on a mandatory basis. The Company also has PAO TMK’s Anti-corruption Policy in place. Additionally, ethics-related matters are outlined in TMK Group’s Counterparty Management Policy and Sustainability Policy.

3.7.4 To achieve its goals in business ethics, the Company:

- continuously monitors compliance risks;

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- trains employees on business ethics and anti-corruption;
- reviews and investigates all reports received via hotline channels, with investigation results communicated to the Company’s management.

4. Final provisions

4.1 To achieve its sustainability goals, the Company intends to:

- ensure the comprehensive implementation of its Sustainability Policy;
- procure the resources required to support the implementation of this Policy;
- continuously improve sustainability processes to bring them in line with industry best practices;
- promote the adoption of responsible business conduct practices among its key business partners.

4.2 We expect our employees and business partners to comply with the principles outlined in this Policy. Should our employees or partners fail to comply with this Policy, the Company may take measures in line with its internal regulations and applicable laws.

4.3 Our employees and stakeholders who become aware of, and/or have reason to suspect, actual or planned violations related to human rights, discrimination, or harassment as well as signs or evidence of fraud or corruption within TMK Group or other violations may report them to the Company’s hotline at https://www.tmk-group.com/Hot_line

4.4 The Company guarantees that it will conduct an unbiased investigation of each report while ensuring the confidentiality of information reported and the identity of the whistleblower.

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