



TMK

APPROVED

CEO of TMK

_____ Igor Korytko

May 24, 2022

TMK GROUP'S CORPORATE STANDARD

ANTI-CORRUPTION POLICY OF PAO TMK

Version No. 0

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TERMS AND DEFINITIONS

The following terms and definitions are used in this Policy:

Anti-corruption Laws	–	A comprehensive set of regulations, including Russian Federal Law No. 273-FZ, On Combating Corruption, dated December 25, 2008 (“Federal Law No. 273-FZ”), along with other federal laws, and resolutions of the Russian Government governing efforts to combat, prevent, and check corrupt practices, including international treaties of the Russian Federation.
Anti-corruption Compliance / Anti-corruption Management System (ACMS)	–	A system encompassing organizational measures, methods, procedures, and corporate culture standards designed and implemented by PAO TMK / TMK Group to ensure the organization’s adherence to the Russian and international regulatory requirements and other binding regulations as well as mechanisms set up within the organization to analyze, identify, and assess risks in corruption-prone areas and thereby provide comprehensive protection of the organization.
Anti-corruption Audit (External/Internal)	–	Activities aimed at providing independent and reliable guarantees and advice to help TMK Group accomplish its goals in order to further improve its operations through employing a systematic and consistent approach to the evaluation and enhancement of its corruption risk identification and management performance and to assess its compliance with Anti-corruption Laws.
Corruption Risk Owner	–	Governing bodies or managers overseeing business segments the strategic or operational goals of which are directly impacted by corruption risks, who are responsible for managing corruption risks.
TMK Group	–	PAO TMK and companies that make part of TMK Group.
Officer responsible for the operation of TMK Group’s Anti-corruption Management System	–	Head of the Anti-corruption Compliance Function within PAO TMK’s Compliance Management Directorate.
Law On Combating Corruption	–	Federal Law No. 273-FZ, On Combating Corruption, dated December 25, 2008.
Corruption Risk Indicator	–	Circumstances that may serve as precursors or signals indicating potential violations of Anti-corruption Laws.
Counterparty	–	Any legal entity or individual, whether Russian or foreign, with whom the organization enters into contractual relations, excluding employment relations.
Corruption Risk	–	Potential circumstances or events of an adverse nature affecting the achievement of TMK Group’s operational and strategic goals and objectives, which may occur due to non-compliance with Anti-corruption Laws.

Corruption	–	Misuse of office, giving or receiving a bribe, abuse of authority, commercial bribery, or any other unlawful exploitation of an individual's position for personal gain or to benefit others at the expense of societal or state interests, involving money, valuables, other property, or monetizable services, or other interests, or other forms of unlawful benefits provided to such individual by other individuals. Corruption also includes any of the above acts committed on behalf or in the interests of a legal entity (Item 1, Article 1 of Federal Law No. 273-FZ, On Combating Corruption, dated December 25, 2008).
Responsible Officer	–	An employee of the Anti-corruption Compliance Function within PAO TMK's Compliance Management Directorate, who is responsible for implementing and overseeing the operation of the Anti-corruption Management System within TMK Group, and performing other functions related to ensuring compliance with Anti-corruption Laws across TMK Group companies.
PAO TMK / Company	–	Public Joint Stock Company Trubnaya Metallurgicheskaya Kompaniya (PAO TMK).
Units	–	Structural units of TMK Group (directorates, offices, sections, etc.).
Policy	–	The Anti-corruption Policy of PAO TMK.
Products	–	Any goods, works, or services marketed by TMK Group.
Anti-corruption	–	Activities undertaken by officers, units, and services within TMK Group (Economic Security Service, Internal Audit Service, Compliance Management Directorate, etc.) within their respective scope of competence and directed toward: –preventing corruption, including through identification and subsequent elimination of the root causes of corruption (corruption prevention) –detecting, preventing, checking, clearing up, and investigating corruption offenses (combating corruption) –minimizing and/or eliminating the implications of corruption offenses.
Employee	–	An individual employed by TMK Group.
Management	–	The Board of Directors and CEO of PAO TMK.

1 GENERAL

1.1 PAO TMK and TMK Group companies are a global provider of effective solutions that meet consumer demand for high-quality pipes. The Company aspires to gain the leadership in the global pipe industry. To achieve this goal, the Company needs to engage in legal, fair, and ethical competition while fully complying with applicable Anti-corruption Laws. The Company stands firmly committed to zero tolerance for any breaches of Anti-corruption Laws in its operations. This Anti-corruption Policy (the “Policy”) outlines the primary goals and objectives of TMK Group in preventing and combating corruption in compliance with Russian and international laws as well as global best practices.

1.2 This Policy has been developed in accordance with applicable Russian anti-corruption laws, practices of enforcing Anti-corruption Laws, global standards, and best practices in corporate governance.

1.3 In everything it does, TMK Group adheres to the following core values, principles, and conduct rules:

1.3.1 Zero tolerance for any forms of corruption, bribery, or corrupt practices.

1.3.2 Alignment of the organization’s policies with applicable laws and customs.

1.3.3 Tone at the top.

1.3.4 Employee engagement.

1.3.5 Proportionality of anti-corruption measures to corruption risks. Integrity in dealings with Competitors, Counterparties, and government bodies.

1.3.6 Effectiveness of anti-corruption procedures.

1.3.7 Accountability and certainty of punishment.

1.3.8 Business transparency.

1.3.9 Ongoing monitoring and regular control.

1.3.10 Upholding high ethical standards.

1.3.11 Upholding high standards of professional conduct.

1.3.12 Following best practices in corporate governance.

1.3.13 Fostering a culture of trust and mutual respect.

1.3.14 Commitment to fair competition.

1.3.15 Embracing social responsibility in business practices.

1.3.16 Compliance with laws and contractual obligations.

1.3.17 Combatting money laundering and terrorism financing.

1.3.18 Objectivity and integrity in HR decision making.

1.4 PAO TMK’s Board of Directors and CEO believe that compliance by employees and Management with Anti-corruption Laws and engaging in lawful, honest, and good-faith activities are fundamental to the Company’s long-term success and pivotal to maintaining the Company’s impeccable reputation in the marketplace.

1.5 This Policy provides the regulatory framework for the operation of TMK Group’s Anti-corruption Management System.

1.6 The Anti-corruption Policy of PAO TMK and TMK Group companies is a local regulation governing the operation of the Anti-corruption Management System across TMK Group, which is designed to identify, manage, and mitigate Corruption Risks, particularly where the Company acts as a buyer or seller of goods, works, or services.

1.7 This Policy reflects the primary goals, objectives, and principles of the Anti-corruption Management System, describes the organizational structure, responsibilities, and authorities of entities within the Anti-corruption Management System, outlines the procedure for interactions between TMK Group units, and mandates measures to prevent breaches of anti-corruption laws by TMK Group.

1.8 This Policy serves as a corporate standard for TMK Group, binding on all, without exception, employees and Management, irrespective of their position. Management should set the tone at the top and foster, through their personal example, an organizational ethos that considers

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unacceptable and rejects acts potentially leading to breaches of Anti-corruption Laws. Commitment to compliance with Anti-corruption Laws and zero tolerance for its breaches form a part of the Company's corporate culture.

1.9 This Policy has been prepared based on the following regulatory documents:

1.9.1 Federal Law No. 273-FZ, On Combating Corruption, dated December 25, 2008, as amended and supplemented.

1.9.2 Guidelines for Development and Adoption of Measures by Organizations to Prevent and Combat Corruption, developed in furtherance of Sub-Item "b", Item 25 of Executive Order of the Russian President No. 309, On Measures to Implement Certain Provisions of the Federal Law On Combating Corruption, dated April 2, 2013, and in accordance with Article 13.3 of Federal Law No. 273-FZ, On Combating Corruption, dated December 25, 2008.

1.9.3 Memorandum of the Ministry of Labor and Social Protection of the Russian Federation, Delegation of Corruption Prevention Responsibilities to Employees within the Organization: Liability and Incentives, dated September 18, 2019.

1.9.4 Guidelines on Conducting Corruption Risk Assessments in Organizations (approved by the Russian Ministry of Labor and Social Protection on September 18, 2019)

1.9.5 ISO 37001:2016 Anti-bribery management systems – Requirements with guidance for use.

1.9.6 ISO 37301:2021 Compliance management systems – Requirements with guidance for use.

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2 POLICY SCOPE

2.1 This Policy constitutes PAO TMK's internal regulation of company-wide significance and is applicable to all TMK Group employees, irrespective of their position, when performing their job duties and/or representing TMK Group interests anywhere globally.

2.2 This Policy governs the functioning of the Anti-corruption Management System to prevent transactions that may potentially offer pecuniary benefits to responsible officers, including in the form of business hospitality, across management, procurement, production, and sales segments.

2.3 The core principles and requirements outlined in this Policy extend to joint ventures and counterparties of TMK Group, including suppliers, agents, intermediaries, advisors, representatives, and other individuals, in cases when relevant obligations are detailed in contracts entered into with such counterparties, in their internal documents, or derive directly from applicable anti-corruption laws.

2.4 When entering into contracts, TMK Group Companies invite counterparties, including suppliers, agents, intermediaries, advisors, representatives, and other persons to adhere to this Policy, with its contents and requirements available on the official website of TMK Group.

3 GOALS AND OBJECTIVES OF THIS POLICY

3.1 This Policy primarily focuses on securing TMK Group's compliance with Anti-corruption Laws and has the following key goals:

3.1.1 Achieving operational excellence of the Company and TMK Group by mitigating corruption risks' impact on business processes and operational and strategic goals through robust control procedures for corruption risk management.

3.1.2 Ensuring full compliance of TMK Group's operations with Anti-corruption Laws, preventing and eliminating the causes of non-compliance with Anti-corruption Laws while fostering an anti-corruption culture across TMK Group.

3.1.3 Establishing a unified approach to proactively address corruption risks and prevent breaches of the anti-corruption laws.

3.1.4 Providing comprehensive information to Company Management and shareholders (beneficiaries) about identified corruption risks and performance of the Anti-corruption Management System.

3.1.5 Ensuring employee awareness of general requirements of Anti-corruption Laws, their liability for breaches, and the compliance mechanisms in place at the Company.

3.2 The Policy's objectives:

3.2.1 Establishing principles and rules for combating corruption within TMK Group.

3.2.2 Applying penalties for corruption offences.

3.2.3 Fostering a culture of anti-corruption behavior and zero-tolerance for corruption.

3.2.4 Implementing protocols to enhance corporate governance concerning corruption risk management at the Company.

3.2.5 Enhancing processes for prompt identification, assessment, prevention, and mitigation of corruption risks and circumstances that may lead to breaches of Anti-corruption Laws, alongside addressing and resolving the implications of realized corruption risks.

3.2.6 Implementing a set of anti-corruption measures in cooperation with the ACMS entities: Economic Security Service, Internal Audit Service, Risk Management and Insurance Office, Compliance Risk Management Directorate, and other relevant units.

3.2.7 Updating employees on key provisions of Anti-corruption Laws, consequences of breaches thereof, and the methods, mechanisms, and controls in place within TMK Group to ensure compliance with Anti-corruption Laws.

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4 ANTI-CORRUPTION MANAGEMENT SYSTEM. OPERATING PRINCIPLES

4.1 The Anti-corruption Management System of TMK Group features a multi-tier structure for identification and management of corruption risks, which involves officers, units, and services (Economic Security Service, Internal Audit Service, Compliance Management Directorate, etc.), PAO TMK's Compliance Risk Management Committee, Compliance Risk Management Subcommittees at TMK Group enterprises, and PAO TMK's Audit Committee, within their scope of authority.

4.2 Each entity within the Anti-corruption Management System carries out specific functions in accordance with their scope of authority and jurisdiction:

4.2.1 Board of Directors of PAO TMK:

- determines the fundamental principles and strategies for organizing the Anti-corruption Management System

- upon recommendation of PAO TMK's Audit Committee, reviews and approves the annual ACMS performance report

- provides strategic guidelines for the Anti-corruption Management System operation, including internal control and corruption risk management procedures.

4.2.2 Audit Committee of PAO TMK:

- reviews and assesses the implementation of this Policy, including the annual ACMS performance report, and submits it to PAO TMK's Board of Directors for approval

- suggests enhancements to the Anti-corruption Management System, including to internal control and corruption risk management techniques

- addresses, together with the Compliance Risk Management Committee, significant breaches of anti-corruption laws and serious deficiencies in the internal control and corruption risk management procedures.

4.2.3 CEO of PAO MK:

- approves the fundamental principles and approaches for organizing the Anti-corruption Management System

- approves the Anti-corruption Policy and other internal regulations pertinent to the Anti-corruption Management System

- reviews the annual ACMS performance report and issues instructions to PAO TMK's Compliance Risk Management Committee to amend and supplement the same, if required

- offers guidance on enhancing the Anti-corruption Management System, including on internal control and corruption risk management measures

- ensures the provision of essential inventories, equipment, and workforce for the operation of the Anti-corruption Management System

- makes other decisions on matters related to the Anti-corruption Management System.

4.2.4 Deputy CEO for Corporate Compliance Risks of PAO TMK:

- provides strategic oversight of the Anti-corruption Management System and ensures implementation of its procedures

- contributes to preparing the annual ACMS performance report and other reports as required

- supervises the activities of PAO TMK's Compliance Management Directorate

- manages and directs the activities of PAO TMK's Compliance Risk Management Committee.

4.2.5 **PAO TMK's Economic Security Service**, in cooperation with other Company units, implements corruption and fraud combating measures within the Company and at TMK Group enterprises to proactively check potential corruption risks in line with the requirements set out in Regulations on PAO TMK's Economic Security Service.

4.2.6 **PAO TMK's Internal Audit Service**, in cooperation within the Company management, aids in enhancing risk management, internal control, and corporate governance systems within the Company and at TMK Group enterprises to ensure compliance with applicable

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laws, policies, procedures, and internal regulations and administrative documents of the Company, including those on insider information, anti-corruption, and adherence to TMK Group’s Code of Ethics.

The Internal Audit Service conducts internal audits at the Company’s units and TMK Group enterprises to independently evaluate the reliability and adequacy of internal control, risk management, and corporate governance systems as well as compliance with insider information and anti-corruption legal requirements. The Service also issues relevant recommendations to enhance the performance of these systems, processes, and operations, providing advisory support to the Company management.

4.2.7 Head of PAO TMK’s Compliance Management Directorate:

- provides the overall management of the Anti-corruption Management System and ensures the implementation of its procedures
- contributes to preparing opinions on the presence or absence of corruption risks as reported by corruption risk owners (as required)
- if needed, participates in preparing opinions on reports and information on anti-corruption law breaches and employee failures to meet the requirements of the Anti-corruption Management System
- considers reports of potential corruption risks and breaches of anti-corruption laws, including those received via PAO TMK’s Hotline
- reviews and submits for consideration to the Deputy CEO for Corporate Compliance Risks of PAO TMK opinions on reports and information on breaches of Anti-corruption Laws and employee failures to meet the requirements of the Anti-corruption Management System, including those received via the Hotline
- engages in the activities of PAO TMK’s Compliance Risk Management Committee.

4.2.8 Compliance Risk Management Committee of PAO TMK:

- oversees corruption risk management within the Company and at TMK Group enterprises in line with this Policy
- approves the Corruption Risk Map, corruption risk management action plan, and any amendments thereto
- endorses the annual employee training plan, including training topics and schedules for the current calendar year, regarding anti-corruption laws as well as any amendments thereto
- reviews the annual ACMS performance report and other reports as required
- coordinates the activities of Compliance Risk Management Subcommittees at TMK Group enterprises.

4.2.9 Compliance Risk Management Subcommittees of TMK Group enterprises:

- carry out corruption risk management at TMK Group enterprises in line with this Policy
- report relevant corruption risks, factors influencing risk related incidences occurred at TMK Group enterprises, calls and reports regarding anti-corruption law breaches at TMK Group enterprises, and calls and reports regarding employee failures to meet the requirements of this Policy to the responsible officer and PAO TMK’s Compliance Risk Management Committee
- make operating decisions regarding the organization and functioning of the Anti-corruption Management System within the area of their responsibility
- participate in employee training sessions on matters related to Anti-corruption Laws at TMK Group enterprises.

4.2.10 Head of the Anti-corruption Compliance Function of PAO TMK’s Compliance Management Directorate (an officer responsible for the operation of TMK Group’s Anti-corruption Management System):

- manages the Anti-corruption Compliance Function within PAO TMK’s Compliance Management Directorate and assigns tasks to staff members
- collaborates with the Anti-corruption Compliance Function staff of PAO TMK’s Compliance Management Directorate to achieve the goals and objectives assigned to the Function
- bears responsibility for the operation of TMK Group’s Anti-corruption Management

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System

- engages in activities involving the Compliance Risk Management Subcommittees at TMK Group enterprises concerning anti-corruption compliance
- exercises other powers within the scope of authority.

4.2.11 **Anti-corruption Compliance Function within PAO TMK's Compliance Management Directorate** (a responsible officer):

- exercises routine monitoring over the Anti-corruption Management System operation, internal control measures, and corruption risk management
- provides opinions on the presence or absence of corruption risks reported by corruption risk owners
- instruct employees on how to adhere to Anti-corruption Laws and established restrictions
- teams up with corruption risk owners to identify business processes susceptible to corruption risks
- monitors corruption risks, considers circumstances and external factors influencing risks of non-compliance with Anti-corruption Laws, and assesses their likelihood
- regularly monitors changes in Anti-corruption Laws and law enforcement practices impacting the corruption risks realization
- informs corruption risk owners and other entities of the Anti-corruption Management System about relevant corruption risks, corruption risk indicators, other risk factors, and amendments to the Anti-corruption Laws
- develops methods for information sharing within TMK Group to promptly identify corruption risks
- prepares suggestions for PAO TMK's Compliance Risk Management Committee regarding improvements to the Anti-corruption Management System, including internal control and corruption risk management measures
- prepares suggestions on updating TMK Group's Corruption Risk Map and amending and supplementing the training plan for PAO TMK's Compliance Risk Management Committee
- contributes to the preparation of performance reports on the Anti-corruption Management System, including the annual ACMS performance report
- participates in the training of employees on matters related to Anti-corruption Laws
- exercises other powers within the scope of authority.

4.2.12 **Corruption Risk Owner** (a TMK Group employee):

- identifies corruption risks arising as part of business processes, either falling within the scope of responsibility or associated with the corruption risk owner
- seeks opinions from the responsible officer regarding the presence or absence of corruption risks in their activities as required
- notifies the responsible officer about potential corruption risk threats, effectiveness of controls, emerging corruption risks, and suggestions to enhance the Anti-corruption Management System
- implements other measures of internal control and corruption risk management
- participates in the development and enhancement of internal control and corruption risk management procedures as required
- undergoes training on matters related to Anti-corruption Laws.

4.3 The responsibility for overseeing the Anti-corruption Management System at TMK Group lies with the Head of the Anti-corruption Compliance Function within PAO TMK's Compliance Management Directorate, serving as the center of excellence for the ACMS implementation and operation.

4.4 The fundamental principles of TMK Group's Anti-corruption Management System are as follows:

4.4.1 **Integration with the Risk Management System.** The Anti-corruption Management System is an integral component of the Company's Risk Management System, aligned with the

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risk management principles and approaches outlined in TMK Group’s Regulations on Risk Management as approved by the minutes of meeting of PAO TMK’s Board of Directors dated December 17, 2020. Corruption risk management strategies are integrated into strategic and operational management across all levels, encompassing all units and employees in the performance of their duties within any business processes and lines of operation of TMK Group.

4.4.2 Inadmissibility of breaches of the Anti-corruption Laws. TMK Group’s Anti-corruption Management System aims to foster a culture of zero tolerance for breaches of Anti-corruption Laws, i.e. inadmissibility of any violations of the Law On Combating Corruption.

4.4.3 Strong cohesion and collaboration among ACMS entities: the Economic Security Service, Internal Audit Service, Risk Management and Insurance Office, Compliance Management Directorate, and other entities aimed at enhancing prompt identification, assessment, prevention, and mitigation of corruption risks and circumstances that may lead to violation of Anti-corruption Laws, alongside addressing and eliminating the implications of realized corruption risks.

4.4.4 Proactive stance on detecting and combating corruption risks. TMK Group proactively assesses and addresses corruption risks within its day-to-day operations and when introducing new or modifying existing business processes.

4.4.5 Ongoing engagement of PAO TMK’s Compliance Management Directorate. Responsible officers within PAO TMK’s Compliance Management Directorate are engaged to assess identified corruption risks in TMK Group’s operational and strategic undertakings as well as to advise employees on the application of Anti-corruption Laws.

4.4.6 Independence, sufficiency of authority and resources of PAO TMK’s Compliance Management Directorate. To prevent conflict of interest, PAO TMK’s Compliance Management Directorate is structurally separated from operational, support, business, and internal audit units within TMK Group. Responsible officers of PAO TMK’s Compliance Management Directorate possess adequate authority, including access to information, to build an effective Anti-corruption Management System and prevent corruption risks.

4.4.7 This Anti-corruption Policy is binding on all employees and Management. The Anti-corruption Policy outlines conduct rules mandatory for all employees and Management to prevent breaches of Anti-corruption Laws.

4.4.8 Personal liability of each employee and Management for adhering to the Policy. Breaching the Policy is deemed a severe misconduct by the Company, potentially leading to disciplinary measures against employees and Management, as well as legal repercussions for breaches of Anti-corruption Laws (administrative, criminal, and civil liability).

4.4.9 Continuous training for employees and Management. TMK Group conducts systematic and ongoing training for employees and Management on fundamental anti-corruption requirements and compliance with Anti-corruption Laws, evaluating employees’ knowledge of essential anti-corruption requirements for their roles.

4.4.10 Collaboration of PAO TMK’s Economic Security Service with law enforcement agencies in anti-corruption efforts in line with internal regulations of the Company (Regulations on PAO TMK’s Economic Security Service):

- TMK Group assumes a public commitment to report instances of corruption offenses that become known to the organization (organization employees) to relevant law enforcement authorities
- Assisting authorized representatives of law enforcement agencies in their audits of the organization’s activities aimed at preventing and combating corruption
- Assisting authorized representatives of law enforcement agencies in checking or investigating corruption offenses, including law enforcement intelligence
- Taking necessary measures to preserve and provide law enforcement agencies with documents and information containing data on corruption offenses.

4.4.11 Engagement in collective anti-corruption initiatives. PAO TMK adheres to the requirements of anti-corruption laws and implements measures stipulated by the Anti-corruption

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Charter of the Russian Business. The Company collaborates with the Chamber of Commerce and Industry of the Russian Federation, its regional associations (www.tpprf.ru), the Russian Union of Industrialists and Entrepreneurs (www.rspp.ru), and other public bodies as part of joint anti-corruption efforts.

4.4.12 Continuous improvement of the ACMS.

4.5 The operation of Anti-corruption Management System is aligned with the requirements of foreign anti-corruption laws, including:

- Foreign Corrupt Practices Act, USA, 1977
- Inter-American Convention against Corruption (OAS Convention), 1996
- Council of Europe Civil Law Convention on Corruption, 1999
- UN Convention against Transnational Organized Crime, 2000
- Council of Europe Criminal Law Convention on Corruption, 1999, ratified by the Russian Federation in 2006
- UN Convention against Corruption, 2003, ratified by the Russian Federation in 2006
- OECD Convention on Combating Bribery of Foreign Public Officials in International Business Transactions, 1997, ratified by the Russian Federation in 2012
- UK Bribery Act, 2010.

5 SYSTEM OF MEASURES TO MANAGE CORRUPTION RISKS

5.1 TMK Group regularly identifies and updates corruption risks associated with its core business activities, evaluating the severity of their impact on business processes, operational and strategic goals of TMK Group, and the materiality of potential adverse consequences of such risks if realized.

5.2 Corruption risks associated with TMK Group's activities are addressed in line with the Company's internal regulations. Corruption risk management encompasses measures for identification, assessment, prevention, and mitigation of corruption risks.

5.3 Measures to proactively prevent and mitigate corruption risks within existing business processes are taken against identified corruption risks. Specific measures to manage corruption risks and monitor the implementation thereof are chosen based on the criticality and likelihood of each risk's occurrence.

5.4 In order to ensure high quality identification of corruption risks, the Responsible Officer continuously tracks amendments in anti-corruption laws and their enforcement practices within TMK Group's core business activities, develops and updates the Corruption Risk Map, and communicates pertinent information to corruption risk owners.

5.5 In order to ensure the sufficiency and effectiveness of the Anti-corruption Management System and assess the outcome of measures taken to identify and prevent corruption risks, along with updating local regulations pertaining to the implementation of the Anti-corruption Management System, the Company conducts anti-corruption audits, monitoring, and assessment of the effectiveness, and adequacy of such measures on an ongoing basis.

5.6 Based on the data obtained, the Compliance Risk Management Committee, on its own or through engaging other business units, prepares and presents an annual ACMS performance report for the previous year and suggestions for enhancing the corruption risk management mechanism, to PAO TMK's Audit Committee, Board of Directors, and CEO. Such reporting should adhere to principles of completeness, timeliness, caution, and content prioritization over form.

5.7 Should the annual ACMS performance report highlight the need for new or revised corruption risk management mechanisms, the Policy may be amended to improve the Anti-corruption Management System.

- 5.8 To prevent the emergence and realization of corruption risks, employees shall:
- fully comprehend and adhere to requirements, principles, and rules set out in anti-corruption laws and this Policy
 - avoid breaches of anti-corruption laws in everything they do

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- promptly report identified corruption risk indicators or potential breaches of anti-corruption laws, including those committed by other employees, Management, Counterparties, or other individuals, to their immediate supervisor, unit head, and responsible officers
- adhere solely to the interests of TMK Group when making managerial and operational decisions in performance of their activities or job duties
- prevent any situations potentially leading to conflict of interest, report any conflict of interest either threatening or arisen to their immediate supervisor, unit head, responsible officer, and provide assistance in resolving such conflict.

5.9 Employees who have any questions about adhering to this Policy or the requirements of anti-corruption laws may reach out to the responsible officer for guidance (resolution).

5.10 Educating and keeping employees informed about the Anti-corruption Management System and compliance with anti-corruption laws aim to enhance their corporate culture, promote awareness of anti-corruption legislation requirements, and reduce the likelihood of corruption risk occurrence. The responsible officer systematically organizes training sessions and keeps employees informed regarding application of anti-corruption laws and updates thereof, acceptable and prohibited commercial practices, and other relevant topics.

6 ANTI-CORRUPTION WHISTLEBLOWING HOTLINE

6.1 TMK Group promptly addresses any evidence of breaching Anti-corruption Laws in its operations, aiming to prevent and reduce any potential adverse consequences of such breaches.

6.2 Employees, Counterparties, and other individuals may report potential breaches confidentially and/or anonymously to the Hotline through the following communication channels:

- **Whistleblower Hotline 8 800 700 8072** (24/7, free to call from anywhere in the country)
- **By e-mail to: 8072@tmk-group.com** (the notification can be sent from any email address)
- **By mail to: 40/2a, Pokrovka Street, Moscow, 101000, Russia, Compliance Risk Management Committee of PAO TMK.**

6.3 Reports and calls received are subject to mandatory registration, with feedback forwarded to the sender's address if available.

6.4 Individuals reporting anti-corruption law breaches committed by TMK Group or its employees are assured of confidentiality regarding the whistleblower's identity and report content, protecting them from any negative consequences due to the report.

7 INTERACTION WITH STATE BODIES EXERCISING CONTROL AND SUPERVISION FUNCTIONS

7.1 Collaboration with government bodies exercising control and supervision functions with respect to the organization is associated with high corruption risks.

7.2 Employees working in audited sections of TMK Group are expected to avoid engaging in illegal or unethical conduct when dealing with public servants engaged in control and supervision activities. It is important to recognize that public servants are bound by specific anti-corruption responsibilities, prohibitions, and limitations.

7.3 TMK Group employees are advised against offering or attempting to offer auditors gifts, including those valued below RUB 3,000.

7.4 To liaise with auditing bodies during audits, monitor such audits, and safeguard the interests of TMK Group, TMK Group may appoint its authorized representatives, including an officer of the Economic Security Service, a responsible officer, and committee or subcommittee members. Their authority is formalized through a power of attorney to represent TMK Group's interests during audits.

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8 LIABILITY FOR BREACHES OF ANTI-CORRUPTION LAWS

8.1 The Company's Management and employees shall adhere to anti-corruption laws and this Policy, including through doing their best to identify corruption risks and situations that may lead to a risk of violating Anti-corruption Laws.

8.2 The liability of individuals for corruption-related offenses is outlined in Article 13 of the Federal Law On Combating Corruption. Under Russian laws, Russian citizens, foreign nationals, and stateless individuals may be subject to criminal, administrative, civil, or disciplinary action for engaging in corruption offenses.

8.3 Should any breaches of anti-corruption laws committed by employees be detected, the Company may initiate an internal investigation to determine the causes of such breaches.

9 FAMILIARIZATION PROCEDURE

9.1 Employees are expected to familiarize themselves with the provisions outlined in this Policy. The Management and employees shall familiarize themselves with this Policy, its annexes, and related Anti-corruption Management System documents, including any updates, which is documented in the familiarization sheet.

9.2 This Policy, as amended and supplemented, is published by PAO TMK on its official website at <https://www.tmk-group.com/>.

10 FINAL PROVISIONS

10.1 This Policy is designed to ensure, inter alia, the implementation of the requirements and recommendations of the following documents:

- Federal Law No. 273-FZ, On Combating Corruption, dated December 25, 2008; Guidelines for Development and Adoption of Measures by Organizations to Prevent and Combat Corruption, developed in furtherance of Sub-Item "b", Item 25 of Executive Order of the Russian President No. 309, On Measures to Implement Certain Provisions of the Federal Law On Combating Corruption, dated April 2, 2013, and in accordance with Article 13.3 of Federal Law No. 273-FZ, On Combating Corruption, dated December 25, 2008.

- Memorandum of the Ministry of Labor and Social Protection of the Russian Federation, Delegation of Corruption Prevention Responsibilities to Employees within the Organization: Liability and Incentives, dated September 18, 2019

- Guidelines on Conducting Corruption Risk Assessments in Organizations (approved by the Russian Ministry of Labor and Social Protection on September 18, 2019)

- ISO 37001:2016 Anti-bribery management systems – Requirements with guidance for use

- ISO 37301:2021 Compliance management systems – Requirements with guidance for use

- Code of Ethics of TMK Group.

10.2 This Policy, as well as all annexes, supplements, and amendments hereto, are subject to approval by the CEO of PAO TMK.

10.3 This Policy enters into force from the date of its approval by the CEO of PAO TMK and remains in force until it is cancelled by a relevant decision.

10.4 Should any changes in Russian laws or regulations conflict with certain clauses of this Policy, the applicable Russian laws will take precedence until the Policy is updated accordingly.

10.5 The requirements of this Policy shall apply to TMK Group and all of its units.

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VERSION HISTORY

Version No.	Document title	Approval date	Effective date	Order document details
1	Anti-corruption Policy of PAO TMK			

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EMPLOYEE FAMILIARIZATION SHEET

Employee full name	Unit	Policy version	Familiarization date	Signature