

Policy for the protection of human rights

The purpose of the policy

OOO Nekstel (hereinafter referred to as the company or "Nekstel") fully respects human rights and freedoms in accordance with generally recognized principles and norms of international law and in accordance with the Constitution of the Russian Federation. This Policy sets out the main principles of the Company's approach to the protection of human rights, as well as guarantees that these rights are respected in all areas of the Company's activities. Nekstel takes appropriate measures to prevent and eliminate human rights violations at all enterprises and in all divisions of the Company, if they are detected.

This Policy should be read in conjunction with the code of business ethics, the equal opportunities HR program, the working conditions Policy, and other relevant company documents.

Application

This Policy applies to all stages and stages of the production cycle, including geological exploration, production, processing, refining, final product production, marketing and sales of non-ferrous and precious metals, as well as measures for closing enterprises, production processes of the Company and all its divisions in all regions of presence. The company recognizes that States within their jurisdiction have an obligation to protect human rights. In this regard, the Company cooperates with government agencies.

The company applies the principles of the human rights Policy to all stakeholders, including:

- employees of the Company;
- employees of suppliers and contractors;
- the counterparties from among organizations in the public and private sector;
- local population in the regions where the Company operates;
- other persons and groups of persons who are affected by the Company's activities or products.

General information

Respect for human rights is one of the fundamental principles of Nekstel's business, which is also reflected in The Company's Code of business ethics. Human rights principles are an integral part of the Company's internal documents related to human resources, environmental protection, and social issues.

The company recognizes that commercial activities play an important role in protecting human rights. Through its activities, Nekstel contributes to the economic development of the regions where The Company operates, as well as to improving the quality of life of the local population.

- other persons and groups of persons who are affected by the Company's activities or products.

Regulatory framework

The company complies with the laws of the Russian Federation and other countries where it operates, as well as international standards for the protection of human rights and labor standards, which are enshrined in the International Charter of human rights, the Declaration of the International labor organization on fundamental principles and rights at work and the UN-approved "Guiding principles of business in the aspect of human rights".

The company's internal documents comply with international standards and principles in the field of human rights protection. The relationship between the Company and its employees is based on respect for human rights and freedoms. The company's code of business ethics States that Nekstel does not allow any form of discrimination and does not use forced labor, providing every employee with equal opportunities to exercise their labor rights regardless of gender, race, nationality, origin, property, social and official status, age, place of residence, attitude to religion, political beliefs, as well as other circumstances that are not related to the employee's business qualities, and systematically solves socially significant tasks in all areas of the company's presence.

Responsibility

This Policy has been approved by the Company's Board of Directors and is subject to periodic review to ensure compliance with international standards in the field of human rights protection, as well as relevant norms of Russian and international law.

The President of the company is responsible for the observance of human rights in Nekstel and compliance with this Policy.

The company's managers at all levels are obligated to respect human rights and comply with the requirements of Russian and international law, as well as the Company's internal documents in the field of human rights. The Company has a clear management vertical where significant issues are brought to the attention of management.

Commitments

Nekstel strives to avoid any human rights violations through effective management and procedures for verifying the legitimacy of decisions.

The company has identified a number of key obligations:

Interaction

- Inform Policy on the protection of human rights to the attention of all stakeholders, including employees and contractors.
- Informing and engaging in effective cooperation of individuals who are affected by the Company's activities.
- Building contractual relationships with contractors and authorities in the countries and regions where the Company operates, taking into account the principles of human rights protection.
- Maintain a continuous dialogue with stakeholders and take their views into account in relation to the protection of human rights.
- Informing all interested parties about the possibilities of reviewing reports of violations in the field of human rights protection through the corporate trust Service.

Analysis and evaluation

- Regularly assess the potential impact of the Company's activities on human rights.
- Develop procedures for a comprehensive review of human rights compliance in business processes, including impact assessment.
- Interaction with stakeholders in the process of assessing and correcting violations.

Monitoring

- Regular monitoring to prevent possible violations of human rights in the Company.
- Monitoring changes in the legislation of the respective countries of the Company's presence, as well as in international standards in the field of human rights protection.

Elimination of violations

- Cooperation with state and law enforcement agencies on human rights issues.
- Timely and objective review of all messages received by the corporate trust Service.
- Elimination of human rights violations.
- Implementation and implementation of programs aimed at creating safe and favorable working conditions.
- Improving standards and practices in the field of human rights for the protection of affected persons as a result of violations of relevant rights.

Reporting

- The company publishes relevant data on the observance of human rights in accordance with generally recognized international principles and legislation of the countries of its presence in the corporate social responsibility report and annual report.
- Regular updating of this Policy in accordance with Russian and international standards for the protection of human rights.

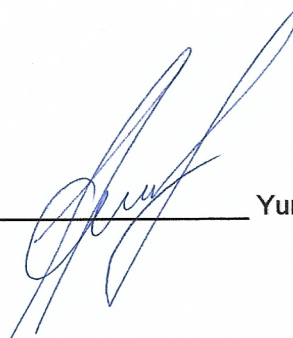
Events

Information about the Company's participation in social partnership projects, human capital development programs, social programs, as well as other information about other activities in the field of human rights protection is disclosed in the corporate social responsibility report and the annual report.

Nekstel's corporate trust service collects information about all cases of human rights violations. The company ensures that applicants who contact the corporate trust Service remain anonymous.

10 November 2020

General Director OOO Nekstel



Yuri Issaev