

Community Engagement Policy

Introduction

This Community Engagement Policy (hereinafter referred to as the “Policy”) of Polymetal International plc (“Polymetal”) and its subsidiaries, but in any case, excluding JSC Polymetal and its subsidiaries¹ (together “the Group”, and each individually a “Group Company”) defines the principles and guidelines for the engagement activities with the local community and aimed at building constructive relationships with its representatives.

With this Policy, we aim to make a positive contribution to the social and economic development of the communities where we operate. The principles set out in this Policy will guide our community engagement initiatives alongside any legislative requirements.

This Policy is a public document and is based on the principles set forth in the following international standards and documents:

- UN Global Compact;
- Standards and guidelines of the International Finance Corporation;
- European Bank for Reconstruction and Development’s Environmental and Social Policy;
- UK Corporate Governance Code;
- Global Reporting Initiative Standards.

Terms and Definitions

Engagement – the process of interacting with stakeholders to produce right decisions and mutually beneficial outcomes for both the company and its stakeholders.

Local community – local populations, public organisations and local authorities.

Social/community engagement system – a set of detailed, specific and consistent actions that an organisation undertakes in order to engage communities and build collective social benefits.

Management – executive managers of Group Companies, who have the authority to make or materially influence major commercial, financial and personnel decisions within a Group Company. Management is responsible for overall compliance of Group Companies with the principles of this Policy, and relevant internal policies and procedures regulating the application of community engagement principles, consistent with this Policy.

Scope of the Policy

This Policy applies to:

¹ Entities directly or indirectly owned by JSC Polymetal 50 percent or more.

- Polymetal International plc;
- All other Group Companies²; and
- All permanent and temporary employees, contractors, managers, officers, directors, business partners and third parties employed or engaged by, or providing services on behalf of, the Group.

Commitments and provisions

Our approach:

- We comply with all the applicable local laws and regulations on community engagement;
- We understand social risks and potential negative impacts, especially on the local communities where we operate, and strive to minimise them;
- We establish and maintain constructive relationships with local communities;
- We maximise local employment opportunities, promote small business development and opportunities for local contractors;
- We encourage the development of connected industries;
- We improve quality of life for local communities and drive socio-economic development where we operate, taking real needs and materiality into account;
- We foster a stable, healthy and safe environment in which communities can live and work;
- We respect human rights.

Key principles:

Group prioritises the following activities when engaging with communities:

- Implementing and maintaining an effective community engagement system for all the Group's facilities and projects;
- Swiftly identifying affected parties, analysing their interests and concerns throughout the planning and implementation of a project;
- Engaging with local communities at all stages including design, construction, operation and closure, taking the requirements of national legislation and applicable international practices into account at all times;
- Implementing and maintaining a feedback system together with a inquiries and grievance mechanism (including anonymous complaints), establishing processes to keep comprehensive records of community engagement activities, considering results of engagement events, the issues raised, outcomes and commitments to ensure any stakeholder concerns raised are responded to in an appropriate and timely manner as well as the appropriate investigation and corrective actions;
- Regularly disclosing information about the Group's sustainable development activities;
- Maintaining functioning of social engagement system in forms that reflect the concerns and priorities of local communities and our business;

² The Scope of the Group's Policy does not however extend to JSC Polymetal and its subsidiaries on the basis that their entire decision-making process is conducted by the management of JSC Polymetal and/or relevant subsidiary of JSC Polymetal. Such subsidiary undertakings have been ring-fenced as part of the Group's response to the designation of JSC Polymetal by the U.S. Department of State. As long as the sanctions are in place Polymetal International plc has no oversight over such decision making process including implementation of policies and procedures.

- Planning and implementing social investments and charitable activities in the framework of socio-economic partnership agreements with due consideration of the views of local communities;

Policy Implementation

The Policy should be considered as inseparable from, and viewed in the context of, the principles and approaches described in the Group's other corporate ethics, stakeholder engagement and public outreach policies. These documents are available on Polymetal's website.

Group Companies shall retain sole responsibility for implementing and complying with the principles of this Policy. All Group Companies shall implement internal policies and procedures regulating community engagement conduct consistent with this Policy so far as they do not contradict the applicable laws and/or other regulatory requirements of the jurisdictions in which they operate.

The internal community engagement conduct policies and procedures of Group Companies can be found on the internal networks of the respective companies. All employees should be made aware of these policies and know where to find them. The policies can be also obtained by contacting the internal communication department of each Group Company.

Breaches of this Policy are a serious matter and may render employees liable to disciplinary action, including dismissal. Equivalent penalties will also apply to contractors, managers, officers, directors, business partners and third parties engaged by or providing services on behalf of the Group. In many jurisdictions, such breaches may also leave individuals liable to prosecution by law enforcement or regulatory bodies. These authorities may impose significant penalties for the misconduct of third parties acting on behalf of the Group. The Group may terminate its relationship with third parties who have been found to be in breach of this Policy or other community engagement policies and procedures.

The Group provides induction and ongoing training on the policies and procedures regulating community engagement for employees of the Group's business entities in accordance with internal regulations.

Review and monitoring

The Policy has been approved by the Board of Directors. The Safety and Sustainability Committee (hereinafter – the Committee) oversees Group's compliance with the principles of this Policy and monitor Management's reporting.

This Policy is subject to review by the Committee as needed but at least once in every three years to consider if it remains appropriate and consistent with the applicable standards and practices, and recommend any changes it considers desirable to the Board for approval.

The Management of Group Companies shall conduct regular performance reviews against the principles of the Policy, as well as internal policies and procedures to ensure that we are fulfilling our commitments. The public relations team of each Group Company is responsible for monitoring the Policy's implementation.

Contacts

We welcome any queries from our stakeholders. Questions regarding the content and application of this Policy can be forwarded to our specialists in any convenient form, including by phone or via e-mail. Our contact details can be found in the Contacts section on Polymetal's official website.