



# ESG Presentation

Barclays ESG Emerging Markets Corporate Day

21 June 2023



# Disclaimer

This presentation and its contents are confidential and may not be reproduced, redistributed, published or passed on to any person, directly or indirectly, in whole or in part, for any purpose. If this presentation has been received in error, it must be returned immediately to Metinvest B.V. (the "Company").

This presentation does not constitute or form part of any advertisement of securities, any offer or invitation to sell or issue or any solicitation of any offer to purchase or subscribe for, any securities of the Company or any of its subsidiaries in any jurisdiction, nor shall it or any part of it nor the fact of its presentation or distribution form the basis of, or be relied on in connection with, any contract or investment decision.

This presentation is not directed to, or intended for distribution to or use by, any person or entity that is a citizen or resident of, or located in, any locality, state, country or other jurisdiction where such distribution or use would be contrary to law or regulation or which would require any registration or licensing within such jurisdiction.

This presentation is not an offer of securities for sale in the United States. The Company's securities may not be offered or sold in the United States except pursuant to an exemption from, or transaction not subject to, the registration requirements of the United States Securities Act of 1933, as amended.

This presentation is directed solely at persons outside the United Kingdom, or within the United Kingdom, to (i) persons with professional experience in matters relating to investments falling within Article 19(5) of the Financial Services and Markets Act 2000 (Financial Promotion) Order 2005 as amended (the "Order"), (ii) high net worth entities, and other persons to whom it may lawfully be communicated, falling within Article 49(2)(a) to (d) of the Order and (iii) persons to whom an invitation or inducement to engage in investment activity (within the meaning of section 21 of the Financial Services and Markets Act 2000) in connection with the issue or sale of any securities of the Company or any member of its group may otherwise lawfully be communicated or caused to be communicated (all such persons above being "relevant persons"). Any investment activity to which this presentation relates will only be available to and will only be engaged with relevant persons. Any person who is not a relevant person should not act or rely on this presentation.

No representation, warranty or undertaking, express or implied, is made as to, and no reliance should be placed on, the fairness, accuracy, completeness or correctness of the information or the opinions contained herein and no reliance should be placed on such information. None of the Company or any of its affiliates, advisors or representatives shall have any liability whatsoever (in negligence or otherwise) for any loss howsoever arising from any use of this presentation or its contents or otherwise arising in connection with the presentation.

To the extent available, any industry and market data contained in this presentation has come from official or third-party sources. Third-party industry publications, studies and surveys generally state that the data contained therein have been obtained from sources believed to be reliable, but that there is no guarantee of the accuracy or completeness of such data. In addition, certain of the industry and market data contained in this presentation may come from the Company's own internal research and estimates based on the knowledge and experience of the Company's management in the market in which the Company operates. While the Company believes that such research and estimates are reasonable and reliable, they, and their underlying methodology and assumptions, have not been verified by any independent source for accuracy or completeness and are subject to change without notice. Accordingly, undue reliance should not be placed on any of the industry or market data contained in this presentation.

The presentation has been prepared using information available to the Company at the time of preparation of the presentation. External or other factors may have impacted on the business of the Company and the content of this presentation since its preparation. In addition, all relevant information about the Company may not be included in this presentation. From 24 February 2022, the Company and its subsidiaries (the "Group") have been significantly affected by the war Russia launched against Ukraine ("the Ukrainian Events"). As a result, future financial and operating performance is subject to a significant level of uncertainty. This presentation should be read in conjunction with the IFRS Consolidated Financial Statements for the year ended 31 December 2022.

This presentation contains forward-looking statements, which include all statements other than statements of historical facts, including, without limitation, any statements preceded by, followed by or including the words "targets", "believes", "expects", "aims", "intends", "may", "anticipates", "would", "could" or similar expressions or the negative thereof. Such forward-looking statements involve known and unknown risks, uncertainties and other important factors beyond the Company's control that could cause the Company's actual results, performance or achievements to be materially different from future results, performance or achievements expressed or implied by such forward-looking statements. Such forward-looking statements are based on numerous assumptions regarding the Company's present and future business strategies and the environment in which it will operate in the future. These forward-looking statements speak only as of the date of this presentation. The Company expressly disclaims any obligation or undertaking to disseminate any updates or revisions to any forward-looking statements contained herein to reflect any change in its expectations with regard thereto or any change in events, conditions or circumstances on which any of such statements are based.

Individual figures (including percentages) appearing in this presentation have been rounded according to standard business practice. Figures rounded in this manner may not necessarily add up to the totals contained in a given table. However, actual values, and not the figures rounded according to standard business practice, were used in calculating the percentages indicated in the text.

The information in this presentation has not been independently verified.



# Impact of the Russian invasion on Metinvest

On 24 February 2022, Russia launched a full-scale military invasion of Ukraine (“the Ukrainian Events”). In the opening stage, Russian troops occupied northern regions of the country and reached the Kyiv suburbs. They were later repelled from several regions, so that active fighting is ongoing mainly in the southern and eastern regions of Ukraine.

The repercussions, including the social and environmental impacts, are profound and mounting:

- both civilian and military casualty numbers continue to increase as Russia carries out sporadic and indiscriminate attacks on Ukrainian territory and targets critical civilian infrastructure
- a massive migration of Ukrainian people to safer areas within<sup>1</sup> the country and outside<sup>2</sup> of it
- Ukraine has suffered over US\$54 bn in environmental damage<sup>3</sup>, mostly due to air and waste pollution

In response to the Ukrainian Events:

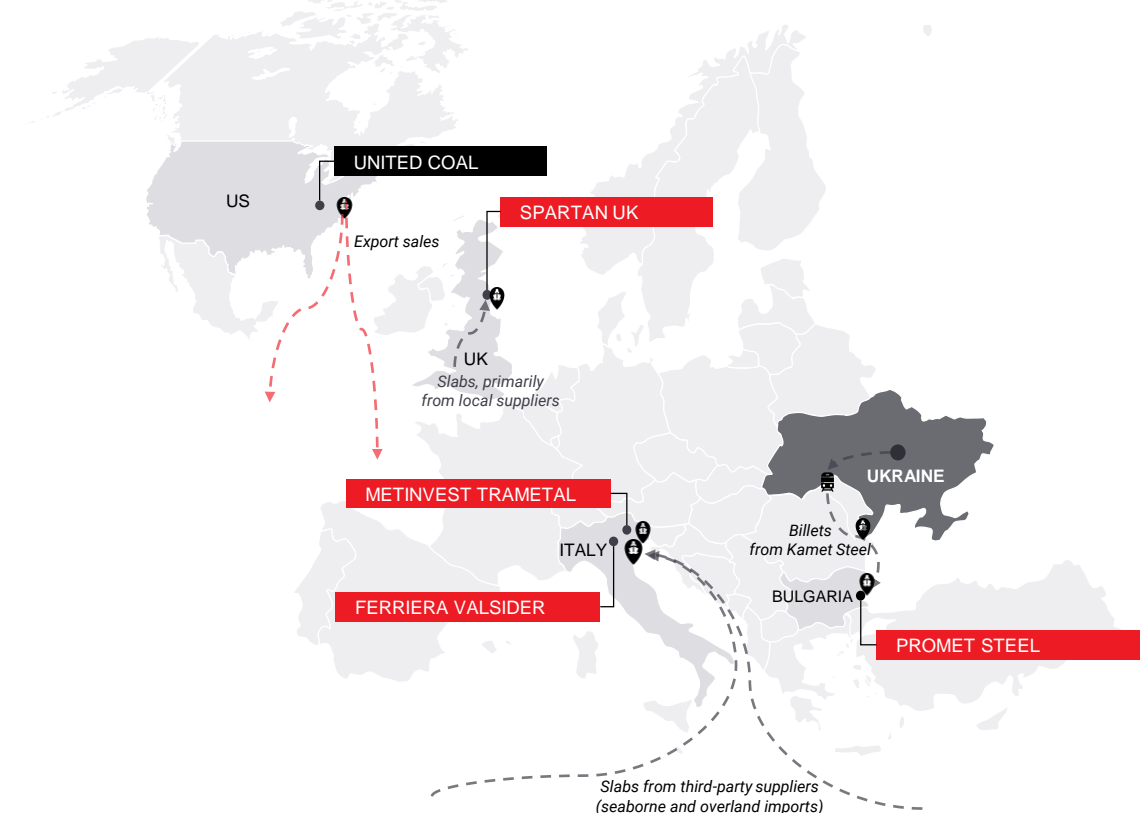
- Metinvest decided to halt production at its assets in Mariupol, Avdiivka and Zaporizhzhia. Facilities in Mariupol and Avdiivka have been affected and Mariupol has been temporarily occupied. Other production assets in Ukraine continue to operate at different capacity utilisation levels subject to security, electricity, logistics and economic factors.
- Assets outside of Ukraine have adjusted their operations as standalone businesses, while the Group has continued to support them with operational, financial and transactional expertise.

The Ukrainian Events have significantly impacted Metinvest’s 2022 environmental and social data disclosed in this presentation. This is due to the suspension of operations of the affected production assets and inability to collect certain pre-war data.

## Ukrainian assets



## Non-Ukrainian assets



1. 5.1 million internally displaced persons as at 23 May 2023, according to the United Nations International Organization for Migration
2. 8.3 million refugees as at 16 May 2023, according to the United Nations High Commissioner for Refugees
3. As at 15 June 2023, according to the Ministry of Environmental Protection and Natural Resources of Ukraine

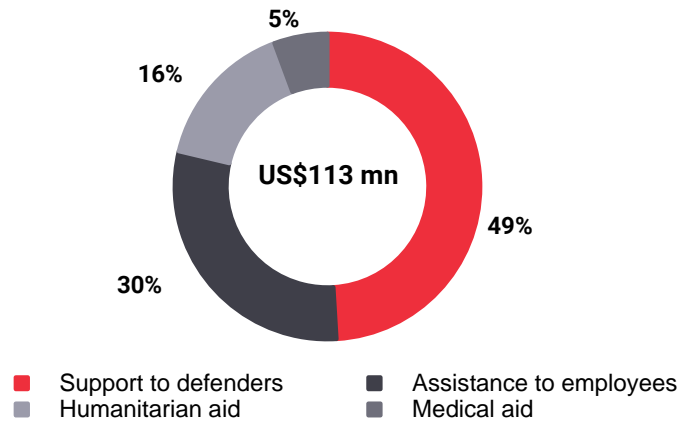


# Metinvest's aid to Ukraine and Ukrainians

Amid Russia's full-scale invasion of Ukraine, the Group has concentrated its efforts on helping Ukraine and Ukrainians in cooperation with its partners

## Spending to assist Ukraine and Ukrainians in the first 15 months of war by focus area<sup>1</sup>

US\$ mn



### Assistance to employees

For more details, see slide 10

### Support to defenders

Metinvest was ranked as the largest donor to the army among private Ukrainian businesses<sup>2</sup>

The Group has provided the following protective equipment to personnel of the Armed Forces of Ukraine, National Guard, territorial defence forces and National Police:

- 150 k bulletproof vests, most of which are manufactured from Metinvest steel
- 25 k helmets
- 31.5 k tourniquets
- 1.7 k thermal imagers
- 1.2 k drones
- gloves, knee pads, goggles, etc

Metinvest has produced and sent nearly 200 mobile shelters, 80 k anti-tank hedgehogs, spiked chains and mini-bastions to Ukraine's defenders

The Group's steel is used to manufacture mobile buggies and protective elements for vehicles operating on the front line

To help the military and civilians to survive winter, the Group has manufactured 5 k field stoves and donated coal and wood

More than 400 generators, multi-charging stations, batteries and portable chargers have been supplied for the military

Metinvest's Ukrainian assets have provided 376 vehicles, including ambulances, and 1.2 mn litres of fuel

The Group is supplying medical items such as first-aid kits, medical equipment, medicine and consumables to the front line to help wounded soldiers

### Humanitarian aid

Metinvest, together with other SCM companies and in coordination with the Rinat Akhmetov Foundation, has created and is financing the Saving Lives humanitarian aid centre<sup>3</sup>

The Saving Lives initiative:

- is supported by almost 200 companies globally
- has already helped almost 500 k Ukrainians
- has delivered 4.2 k tonnes of food and other essentials

Saving Lives and the UN Global Compact Ukraine have announced the establishment of psychological rehabilitation and support centres for affected civilians

Saving Lives and the Protez Hub project are providing and maintaining prosthetics for Ukrainians affected by the war

Saving Lives has joined the Unbreakable Mum project run by the Masha Foundation to provide psychological help to affected women and children

The Group is helping to equip urban and rural shelters, as well as places to accommodate people from hot spots

### Medical aid

Metinvest is delivering vital medicine, equipment and consumables to local hospitals

Almost 1.6 k tonnes of oxygen have been delivered to healthcare institutions free of charge

Together with the PULSE charitable foundation, the Group is promoting the development of tactical medicine

1. This includes all cash payments and other contributions made by the Group, its joint ventures and associated companies.  
 2. [NV rating for the largest supporters of the defence efforts.](#)  
 3. [Savings Lives humanitarian initiative.](#)



# Contribution to sustainable development

Metinvest adheres to the Ten Principles of the UN Global Compact, which cover human rights, labour relations, environmental protection and anti-corruption.

The Ukrainian Events have significantly affected Metinvest's activities and projects that contribute to the achievement of the Sustainable Development Goals (SDGs).

Despite this, the Group has not revised the five priority SDGs that it believes to be most relevant for its business:

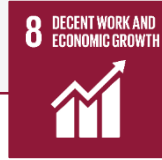
- SDG 8 – Decent Work and Economic Growth
- SDG 9 – Industry, Innovation and Infrastructure
- SDG 11 – Sustainable Cities and Communities
- SDG 12 – Responsible Consumption and Production
- SDG 13 – Climate Action

Due to the war, most of Metinvest's projects and initiatives have focused mainly on helping Ukraine and its people.

Member of UN Global Compact



Since 2010



- Maintain operational efficiency and conduct critical repairs
- Strive to provide safety for employees and their families
- Provide medical, psychological and other assistance to affected employees and their families
- Work with the Ukrainian government and businesses on the post-war reconstruction of Ukraine



- Develop Metinvest's Career Centres together with Rehabilitation Centres to provide a full range of services in one place
- Provide an extensive array of training and development opportunities through the Corporate University and Metinvest Polytechnic
- Enhance digital transformation and improve information security



- Provide humanitarian aid to affected people in Ukraine through the Saving Lives humanitarian aid centre
- Support defenders with protective and medical items
- Equip shelters and places to accommodate people from hot spots
- Provide hospitals with medicines, equipment and consumables



- Improve energy safety management to minimise losses as a result of forced shutdowns and production cutbacks
- Use innovative resource-efficient technologies
- Recycle by-products from steelmaking
- Increase the share of reused and recycled water



- Improve energy efficiency programmes
- Enhance carbon reporting
- Analyse climate-related governance and risk management systems in accordance with TCFD<sup>1</sup>
- Assess climate change risks and opportunities using scenarios recommended by the Paris Agreement<sup>2</sup>

1. [Task Force on Climate-related Financial Disclosures.](#)  
 2. [The Paris Agreement.](#)




# ESG ratings




In 2023, MSCI affirmed its ESG Rating for Metinvest at 'BB' (on a scale of 'AAA' to 'CCC'). The assessment is based on 2018-20 data<sup>1</sup>.

The agency noted the Group's leading position in occupational health and safety programmes, which extend to contractors, while management remuneration is linked to safety performance. In addition, MSCI assessed business ethics practices and labour management initiatives as strong.



In March 2023, S&P assigned a debut ESG Score to Metinvest of 37 (out of from a maximum of 100). Later, the rating was further improved to 38. The assessment is based on 2018-21.

The agency gave the Group's performance on governance and economic dimension the highest score.



In 2023, Sustainalytics improved Metinvest's ESG Risk Rating to 40.5 from 40.9 (on a scale between 0, lowest risk, and 100, highest risk). The rating was further improved to 39.1<sup>2</sup>.

The assessment is based on 2019-21 data, but includes the risk associated with the war in Ukraine, which is out of Metinvest's control. Such changes were incorporated by Sustainalytics to its assessment methodology in March 2022.

The agency assessed the Group's management of ESG risks as strong, mentioning that Metinvest strengthened its occupational health and safety measures, as well as human resources strategy, including on diversity and non-discrimination issues. Sustainalytics noted that the Group was not involved in significant controversial accidents with substantial environmental or safety liabilities as at the date of review.

If the effect of the full-scale war was excluded, the Group's estimated ESG Risk Rating would be 27.9, implying the medium risk category.

1. Disclaimer statement. The use by Metinvest B.V. of any MSCI ESG Research LLC or its affiliates ("MSCI") data, and the use of MSCI logos, trademarks, service marks or index names herein, do not constitute a sponsorship, endorsement, recommendation or promotion of Metinvest B.V. by MSCI. MSCI services and data are the property of MSCI or its information providers, and are provided 'as-is' and without warranty. MSCI names and logos are trademarks or service marks of MSCI.

2. As at the date of this presentation.





# Environmental highlights

When the full-scale invasion started:

- Metinvest suspended production operations of some of its Ukrainian assets to ensure the safety of its employees and prevent any industrial accidents
- almost all ongoing environmental CAPEX projects in Ukraine were suspended
- critical repairs continue to be carried out to keep dust and gaseous emissions at below permitted levels

As hostilities disrupted power supplies, Metinvest focused its efforts on energy safety management, aiming to maintain functionality and minimise losses from forced shutdowns and production cutbacks.

The Group remains dedicated to adhering to the highest standards and meeting the expectations of stakeholders, even under the most challenging circumstances.

## 2022 results

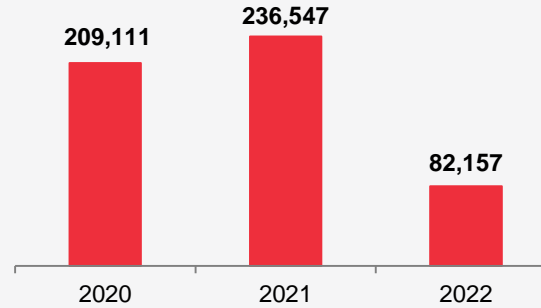
- US\$163 mn was spent on the environment<sup>1</sup>, down 68% y-o-y
- the Group's environmental impact decreased, mainly due to the shutdown of Mariupol steelmakers since February 2022:
  - direct energy consumption declined by 66% y-o-y
  - air emissions fell by 79% y-o-y
  - water intake decreased by 82% y-o-y
  - the Group recycled and reused 91% of water consumed from all sources, up 10 pp y-o-y
  - the amount of generated waste decreased by 59% y-o-y, while the share of recycled waste rose by 3 pp y-o-y

In 2023, the environmental function has been merged into the Technical Development Directorate to integrate the environmental agenda into the Group's technological strategy.

At the end of 2022, 16 assets<sup>6</sup> were certified to ISO 14001:2015 and six assets<sup>6</sup> to ISO 50001:2011.

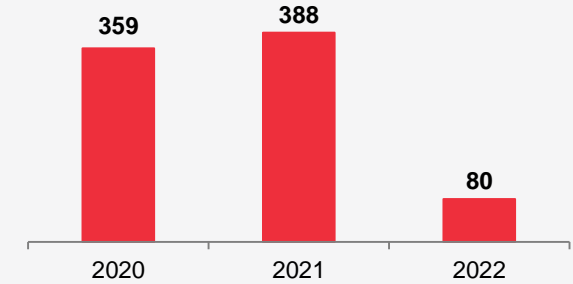
## Direct energy use<sup>2</sup>

TJ



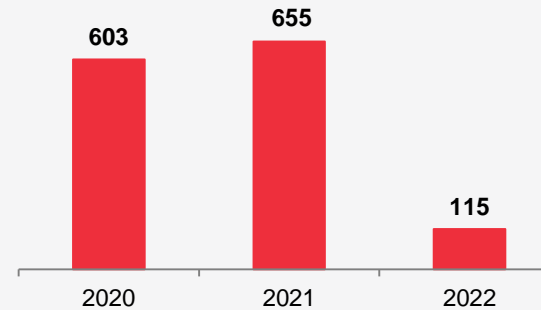
## Air emissions (excluding GHG emissions)<sup>3</sup>

KT



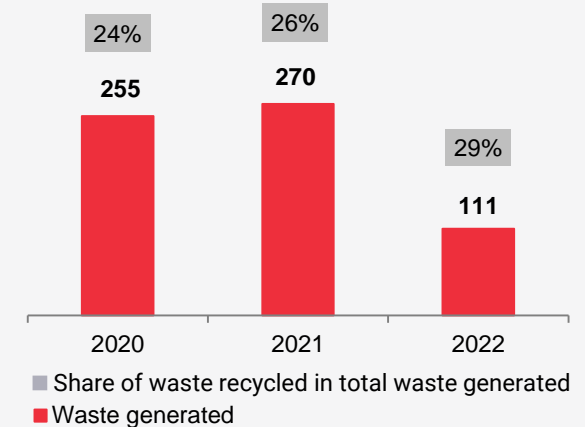
## Water intake<sup>4</sup>

MCM<sup>5</sup>



## Waste generated and recycled

MT



Note: 2022 figures on this slide are preliminary and may change on completion of internal verification procedures.

1. Including both capital and operational improvements. The environmental CAPEX calculation is based on Ukrainian regulatory requirements and methodology and may differ from the IFRS approach.
2. Only purchased (or extracted) fuel was factored into the calculations. The coefficient used for conversion from TOE to TJ is 1 TOE = 0.0293076 TJ. Metinvest does not use higher heating values (HHV), also known as gross calorific values (GCV), in its calculations of energy consumption from fuel.
3. Gross air emissions include nitrogen dioxide (NO<sub>2</sub>), sulphur dioxide (SO<sub>2</sub>), carbon monoxide (CO), solids (dust) and other.
4. Water intake is water withdrawal from water bodies for consumption or storage.
5. Million cubic metres.
6. Excluding the Group's assets affected by the war.



# Decarbonisation

Prior to the Ukrainian Events, Metinvest was finalising the development of a long-term decarbonisation roadmap, although it has since had to postpone this because of the war in Ukraine.

The decarbonisation journey of Metinvest’s Ukrainian assets will need to be reviewed comprehensively once the active conflict is over and the impact of the war is assessed.

Metinvest remains committed to its green steel future and continues to prepare for a carbon-neutral transition focusing on:

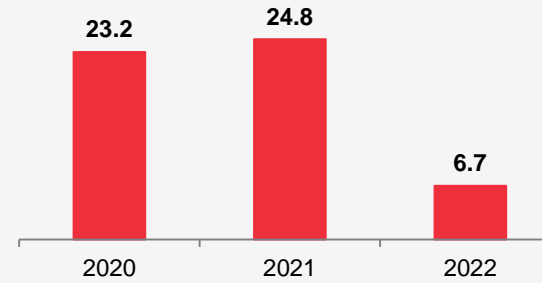
- improving the quality of its iron ore products as its magnetite ores are well suited for pelletising (Central GOK is already capable of producing 2.3 mt of high-graded pellets used in DRI technology)
- shifting to low-carbon technologies (both proven and prospective) to produce steel

## 2022 results

- Since 2021 Metinvest has reported its direct CO<sub>2</sub> emissions in compliance with new Ukrainian legislation, which is in line with the EU approach.
- The Group’s 2022 carbon indicators changed, mainly due to the suspension of operations of Mariupol steelmakers and Avdiivka Coke amid the Russian invasion:
  - scope 1 CO<sub>2</sub> emissions fell by 73% y-o-y
  - scope 2 CO<sub>2</sub> emissions dropped by 66% y-o-y
- Direct CO<sub>2</sub> emissions intensity rose by 13% y-o-y, y, mainly due to Kamet Steel’s greater coke consumption and power shortages in 4Q 2022.

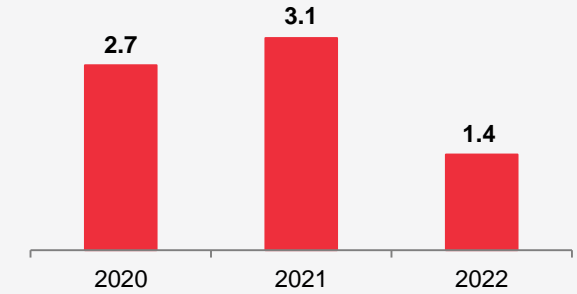
## Direct CO<sub>2</sub> emissions (Scope 1)<sup>1</sup>

MT of CO<sub>2</sub> equivalent



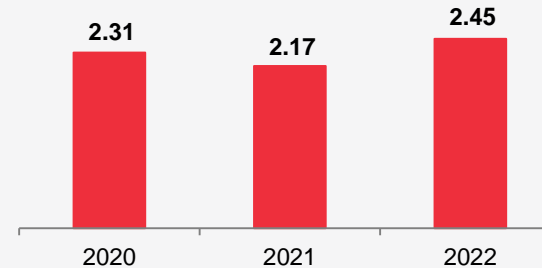
## Indirect CO<sub>2</sub> emissions (Scope 2)<sup>1</sup>

MT of CO<sub>2</sub> equivalent

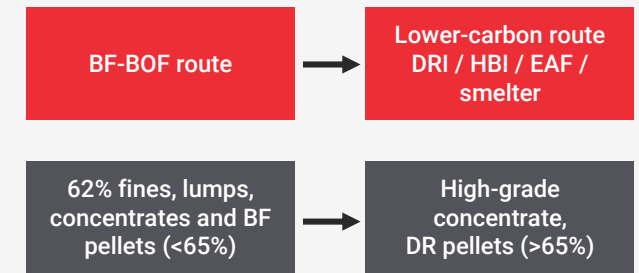


## Direct CO<sub>2</sub> emissions intensity<sup>2</sup>

Per tonne of crude steel



## Global trend towards low-carbon route requires higher-grade iron ore products<sup>3</sup>



Note: 2022 figures on this slide are preliminary and may change on completion of internal verification procedures. They do not cover all Group entities as Metinvest was unable to collect certain data from assets affected by the hostilities.

1. The GHG emissions of Metinvest’s assets include carbon dioxide (CO<sub>2</sub>), methane (CH<sub>4</sub>) and nitrous oxide (N<sub>2</sub>O), while CO<sub>2</sub> remains the primary greenhouse gas emitted by the Group. Scope 1 CO<sub>2</sub> emissions includes emissions from stationary and mobile sources. Scope 1 CO<sub>2</sub> emissions from stationary sources were calculated in accordance with the Ukraine’s new law “On the Principles of Monitoring, Reporting and Verifying Greenhouse Gas Emissions”, which is in line with the EU approach. Scope 1 CO<sub>2</sub> emissions from mobile sources and Scope 2 CO<sub>2</sub> emissions were calculated using the Greenhouse Gas Protocol.
2. The calculation is based on Scope 1 stationary and mobile CO<sub>2</sub> emissions of the Group’s steelmakers. As Metinvest is a vertically integrated company and self-sufficient in core raw materials for steel production, only those material flows directly used in steelmaking processes were taken into account, while volumes of merchant pig iron were not included.
3. BF – Blast furnace; BOF – Basic oxygen furnace; DRI – Direct reduced iron; HBI – Hot briquetted iron; EAF – Electric arc furnace.





# Climate change actions

Metinvest recognises that climate change is a global challenge and supports the fight against it.

In 2021, the Group added a separate risk related to the impact of climate change on the sustainability of its business to the risk map.

To follow the best global practices in withstanding climate change and extend the assessment of climate change risks and opportunities, Metinvest engaged an expert to assess applicable climate change risks and opportunities using recommendations provided by four pillars of the Task Force on Climate-related Financial Disclosures (TCFD) frameworks: Governance, Strategy, Risk Management, and Metrics and Targets. It includes the following:

- improvement of the climate governance structure
- integration of climate change risks into the Group's risk management system
- assessment and management of material physical and transition risks identified for Metinvest
- analysis of climate change impact on the Group in the future using at least two warming scenarios

Metinvest has already identified the Carbon Border Adjustment Mechanism (CBAM) as a potential climate transition risk. The Group analyses an impact of the upcoming regulation and considers the mitigation measures.



## Governance

- Assessment of Group governance regarding climate-related risks and opportunities
- Analysis of Supervisory Board oversight of climate change issues
- Designation of the executive team's role in assessing and managing climate-related risks and opportunities

## Strategy

- Identification and assessment of climate-related risks and opportunities over the short, medium and long term
- Impact evaluation of climate-related risks and opportunities on operational and financial results in the short, medium and long term, using different climate-related scenarios

## Risk management

- Analysis of the processes for identifying, assessing and managing climate-related risks
- Identification of owners of climate risks
- Integration of assessment of climate-related risks processes into the risk management system

## Metrics and targets

- Metinvest calculates and discloses its carbon emissions (Scope 1 and Scope 2) and carbon intensity in accordance with common industry practices
- Assessment of climate change risks related to the Group's carbon emissions



# Social highlights

Metinvest's top priority is safeguarding employees, their families and community members.

## Employees

As one of the largest employers in Ukraine, the Group has organised evacuation from hot spots, while also providing temporary accommodation, medical and psychological assistance, food and necessities to affected employees and their families.

Temporary shelters were created for more than 6 k employees and their families evacuated from Mariupol and Avdiivka.

Metinvest Career Centres, in cooperation with partners, have employed around 5.5 k of internally displaced employees.

Education at Metinvest Polytechnic is available for the Group's employees and their children for free.

In 2022, the Group's headcount decreased by 14% y-o-y.

Around 5.4 k employees were serving in the defence forces of Ukraine as at the end of 2022.

## Health and Safety

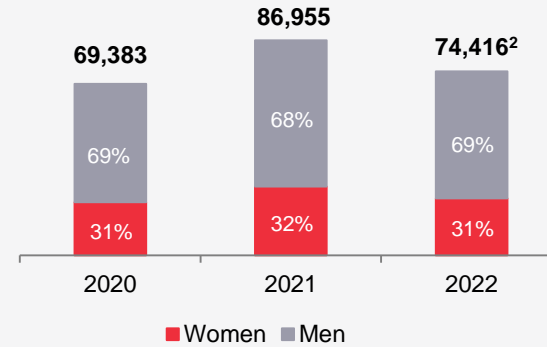
Amid the full-scale war in Ukraine, the Group has focused its occupational safety priorities on:

- lifting mechanisms and operations
- railway transportation and repair work
- gas work and mine work

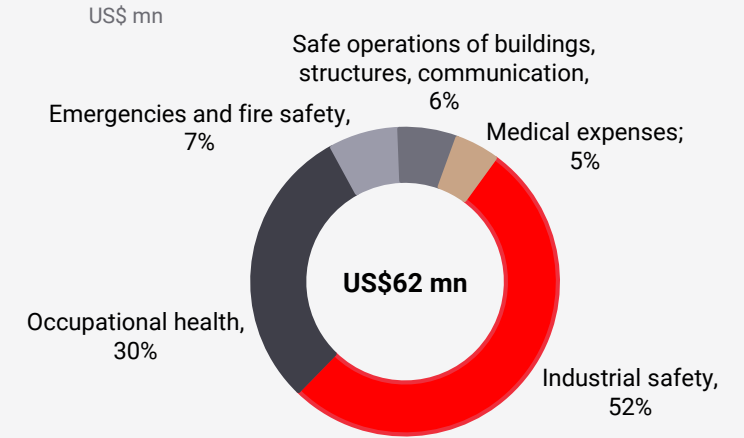
In 2022, the FFR was 0.025 and LTIFR was 0.977, down from 0.059 and up from 0.794 a year earlier, respectively.

At the end of 2022, 14 assets<sup>1</sup> were certified to ISO 45001.

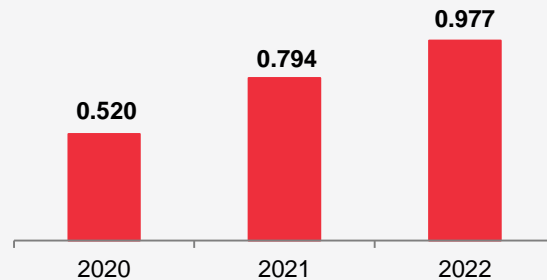
## Employee headcount



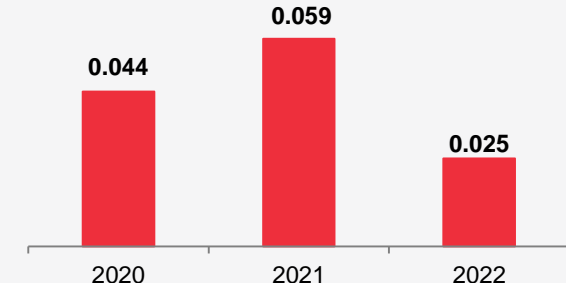
## Spending on health and safety in 2022



## Lost-time injury frequency rate<sup>3</sup>



## Fatality frequency rate<sup>4</sup>



Note: 2022 figures on this slide are preliminary and may change on completion of internal verification procedures. They do not cover all Group entities as Metinvest was unable to collect certain data from assets affected by the hostilities.

1. Excluding the Group's assets affected by the war.
2. Including around 24,000 employees in Mariupol and Avdiivka with whom labour relations were suspended given the impact of the war. The management has sought to maintain contact with them and retain the workforce for potential future employment at the Group's assets.
3. The lost-time injury frequency rate (LTIFR) is the number of lost-time incidents per 1 million man-hours and does not include hostility-related incidents.
4. The fatality frequency rate (FFR) is the number of job-related fatalities per 1 million man-hours and does not include hostility-related incidents.



# Governance highlights

## Governance structure

Metinvest B.V.'s corporate governance structure has been developed in accordance and compliance with Dutch laws

In 2022, Margaryta Povazhna and Sergii Zuzak joined the Supervisory Board

At the upper level of the Group's corporate governance, the Supervisory Board's Health, Safety and Environmental Committee delivers strategic supervision over implementing and maintaining the highest standards of health, labour and environmental safety culture throughout the business.

## Corporate regulation

Metinvest's approach to environmental impact management and health and safety efforts are governed by the Policy and Principles in the Field of Health, Safety and the Environment

In 2022, the Group revised the Business Security Policy to improve the security of its business processes and employees

The following corporate documents were adopted in 2022:

- Human Capital Management Policy, which seeks to foster a working environment that is both safe and supportive
- Approaches and Principles of Social Spending and Local Community Engagement, which determines priority areas and sets criteria for project selection

## Reporting practices

Starting with the Annual Report 2021, to improve the transparency and timeliness of information disclosure, Metinvest combined its annual and sustainability reports into a single report with a strong emphasis on sustainability matters under GRI and SASB guidelines

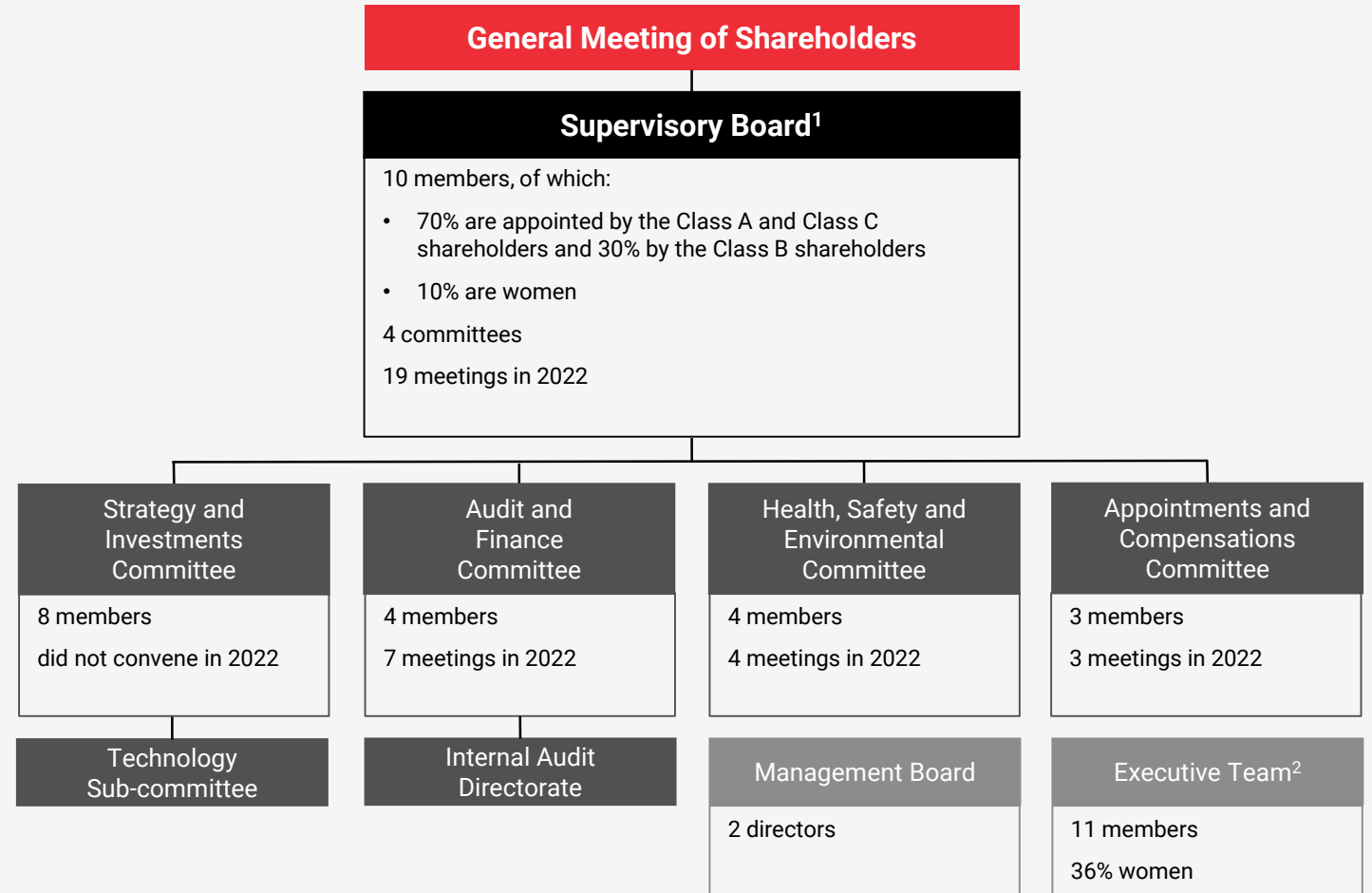
Since 2010



Since 2019



## Governance structure



1. [Composition of the Supervisory Board.](#)  
 2. As at 31 May 2023.



# Business Ethics and Compliance

Metinvest's **Code of Ethics** is the foundation of ethical business behaviour across the Group. It defines core values for engaging with stakeholders, such as life, health and the environment, customer focus, professionalism, leadership and teamwork.

The Group strictly follows anti-corruption laws in its daily operations. It does not tolerate or take bribes, nor does it promote corruption. It is committed to working with counterparties and business partners whose reputation is not associated with corruption and bribery.  
In 2022, no cases of corruption violations involving public officials were reported or confirmed.

The Procedure on Anti-Money Laundering and Countering the Financing of Terrorism (AML/CFT) requires obligatory compliance due diligence checks of all counterparties.  
In 2022, Metinvest checked 7,067 transactions for potential AML/CFT violations; 4,450 counterparties were banned from cooperation.

The Procedure for Declaring Conflicts of Interest requires employees to inform their direct supervisor and the legal team about any real or potential conflict of interest.  
In 2022, 84% of declarants submitted annual declarations and 35 forms disclosed a conflict of interest.

**Ethics Committee**

**Code of Ethics**

**Compliance Programme**

**Compliance Support Regulations**

**Compliance Checks**

**Internal**

**External**

**Anti-corruption and anti-bribery**

**Anti-money laundering and countering the financing of terrorism**

**Conflict of interest**

**Anti-monopoly**

**Trust Line**

The Ethics Committee meets once a quarter to discuss the implementation of the Compliance Programme throughout the Group, take decisions concerning conflicts of interest and review reports received through the Trust Line.

Metinvest's Compliance Programme (introduced in 2014) ensures transparency and acts as an anti-corruption mechanism.

Anti-monopoly policies are in place at Group's largest enterprises, while the legal team has a unit dedicated to monitoring compliance in this area.  
In 2022, no fines and/or sanctions for anti-competitive behavior were imposed on the Group.

## Supplier selection

The Code of Business Partnership and the Policy on Supplier Selection ensures that Metinvest always seeks to work with partners and contractors that share its ethical and business principles, including those regarding HSE, by conducting supplier assessments through pre-qualification and pre-contract procedures  
In 2022, around 8,000 pre-contract assessment procedures and more than 4,000 pre-qualification reviews were conducted, during which around 100 suppliers were disqualified

Metinvest uses the Trust Line maintained by SCM, one of its shareholders, allowing the Trust Line, 113 of which were confirmed in stakeholders to anonymously report violations of the law, breaches of business conduct and corporate ethics.  
In 2022, 392 reports were submitted through the Trust Line, 113 of which were confirmed in such areas as violations of internal procedure and others.



## Investor relations contacts

Yuriy Mykhantso

Head of Investor Relations

+31 20 644 00 80 (the Netherlands)

yuriy.mykhantso@metinvestholding.com

Christina Rusnak

ESG and Sustainable Finance Manager

Kristina.Rusnak@metinvestholding.com

metinvestholding.com