

APPROVED
by order of MC Delo
dated February 16, 2022 No.7

**POLICY OF MC DELO
IN THE FIELD OF HUMAN RIGHTS
(revision No. 1)**

City of Moscow
2022

This Policy has been developed in accordance with the Universal Declaration of Human Rights (1948) ("Human Rights"), the International Covenant on Civil and Political Rights (1966), the International Covenant on Economic, Social and Cultural Rights (1966), the Basic Conventions of the International Labour Organization (hereinafter - ILO) No. 29, 87, 98, 100, 105, 111, 138, 182, and the Declaration of Fundamental Principles and Rights at Work, the Constitution of the Russian Federation and the Labor Code of the Russian Federation.

1. Scope of application

This policy shall apply to the relations between the Limited Liability Company "Management company "Delo" (hereinafter - "MC Delo", the employer) and all significant stakeholders. All employees of MC Delo are obliged to comply with this Policy. In cases where the laws and regulations of the countries of presence of MC Delo differ from this Policy, MC Delo shall apply any higher standards with respect to human rights.

2. Objective

The objective of this policy of MC Delo is full respect for human rights and freedoms in line with the generally recognized principles and norms of international law and in accordance with the Constitution of the Russian Federation. This Policy presents the basic principles of MC Delo approach to protection of human rights, as well as guarantee that these rights are respected in all fields of endeavor. In case of detection of any violations of human rights at all levels, MC Delo takes appropriate measures to prevent and correct the same. This Policy shall be considered in conjunction with the Code of Business Conduct and the Occupational Safety Policy of MC Delo.

3. General provisions

Within the framework of its activities MC Delo commits to:

- 3.1. Respect human right to life, liberty, and personal integrity.
- 3.2. To prevent the use of any form of forced labor in its activities.
- 3.3. Guarantee the right to fair and decent remuneration, safe and healthy working conditions, the right to rest and leisure, as well as the necessary social support, inter alia, in case of illness, disability, loss of breadwinner, in old age and in

other cases of loss of livelihood due to circumstances beyond the control of employee.

3.4. Recognize the right to freedom of association, the right to collective bargaining, the right to form and joint trade unions for protection of their interests.

3.5. Respect the right of local communities to favorable living conditions, contributing to reduction of negative impact on the regions of presence in terms of economic, environmental, social and cultural aspects.

4. Principles

4.1. Freedom of labor

MC Delo waives the use of any form of forced or bound labor (as this term is defined in ILO Convention No. 29) and does not seize money or identity documents at the beginning of employment relations in order to detain employees against their will.

4.2. Respect for diversity and non-discrimination

MC Delo rejects any form of discrimination and seeks to ensure respect for its employees, as well as to create equal opportunities, both at the beginning of the employment relationship and at every stage of employment.

4.3. Freedom to form associations and collective bargaining

MC Delo recognizes the right of its employees to form and join any organizations aimed at protecting and supporting their interests, and does not affect the decisions they make. MC Delo also recognizes their right to have their interests represented (within the framework of various labor teams) by trade unions or other persons elected in accordance with the legislation and practice in force in different regions where the employees of MC Delo work.

4.4. Occupational safety

MC Delo is responsible for ensuring a high level of occupational safety at workplace.

MC Delo supports dissemination and strengthening of safety culture by raising awareness of risks and inbreeds a responsible attitude in all its employees, including through informing and training.

MC Delo seeks to preserve health and ensure safety of its employees, and also to promote interests of any other concerned parties, in particular through the use of preventive measures.

4.5. Decent and favorable working conditions

For the purpose of ensuring decent and favorable working conditions MC Delo rejects any form of discrimination: harassment, insults, physical violence, verbal abuse, sexual humiliation or psychological impact, threats or intimidation at or beyond workplace.

The principles of decent and equal remuneration for men and women for work of equal value and complexity are taken into account when fixing the amount remuneration on the basis of objective assessment of work proceeding from the amount of work to be performed (ILO Convention No. 100). The minimum compensation (wage) received by employees of MC Delo may not be lower than the minimum level established in labor agreements and legal regulation in force in each region in accordance with the provisions of ILO conventions.

MC Delo also recognizes the importance of professional orientation and training for the purpose of development of human resources and skills of employees by improving the forms of involvement and participation of employees and their representatives.

4.6. Engagement with local communities

In carrying out its activities MC Delo seeks to improve the quality of life and well-being of communities living in the regions of its presence, and also strives to make a positive impact on their social and economic development.

MC Delo expresses its commitment to the principles in the field of engagement with local communities proclaimed in the UN Global Compact, the UN Declaration on the Rights of Indigenous Peoples, the International Labour Organization Convention on Indigenous and Tribal Peoples in Independent Countries, and other relevant regulatory legal documents of the Russian Federation and international documents.

Within the framework of its activities MC Delo commits to:

identify stakeholders among representatives of local communities and respect their interests when planning and implementing its activities;

conduct a dialogue and arrange consultations with representatives of local communities on issues affecting their quality of life and well-being, as well as to involve them in discussion of significant issues related to development of region of presence;

obtain prior consent of indigenous peoples and other representatives of local communities for implementation of projects that can have an impact on their rights and quality of life;

publicly disclose up-to-date information on sustainable development activities, as well as regularly inform stakeholders about plans, prospects and potential changes;

develop an effective mechanism for prompt consideration of complaints from stakeholders and appropriate response;

maintain a supportive and safe living environment for local communities;

respect the rights of indigenous peoples, and also to take whatever action is appropriate in order to avoid forced displacement of indigenous peoples from their communal land;

seek to prevent any significant impact on social, cultural, economic and political heritage of local communities;

promote cooperation with regional authorities, local self-government bodies, public organizations, representatives of small and medium-sized businesses for the purpose of social and economic development of regions of presence;

strive to expand employment opportunities for representatives of local communities;

support the system of vocational education, healthcare, to foster development of culture and sports in region of presence;

provide, as far as possible, charitable support to public organizations and vulnerable segments of the population;

prevent implementation of social investment programs that support illegal or dangerous activities that contradict the values of MC Delo.

4.7. Confidentiality and information exchange

MC Delo respects confidentiality and the right of its stakeholders to privacy, and consistently follows the principles of proper use of information and data provided to the public.

MC Delo also seeks to ensure interaction with institutions and business entities in a way that excludes discrimination by demonstrating respect for different cultures, as well as placing emphasis on avoiding any adverse impact on the most vulnerable segments of the population, in particular, on children.

4.8. Training

Trainings in human rights protection are conducted on a regular basis with a view to protect human rights of employees of MC Delo and affiliated companies of MC Delo, as well as to maintain a favorable working environment.

Timing and frequency of trainings in human rights protection are determined at the initiative of the Director for Legal Affairs being the chief of legal service of MC Delo and approved by the authorized management body of MC Delo.

5. Reports on human rights violations

5.1. There is a Hotline created for the purpose of receiving reports on potential violations of human rights in MC Delo and affiliated companies of MC Delo, through which any employee or any other person can report in a convenient form on any violation of human rights that comes to his knowledge.

The Hotline is created in order to improve the level of corporate governance, promptly identify potential violations of human rights in the companies of the Delo Group of companies, and to respond the same.

5.2. Reports on potential violations of human rights can be handed as follows:

through the feedback form on the official website of MC Delo and the relevant employer company;

to the email: ethic@delo-group.com

to immediate supervisor or, if the latter is suspected of committing violation of human rights, to a line manager;

in any other accessible ways that are not inconsistent with the legislation of the Russian Federation and local regulations.

5.3. The Delo Group of companies verifies the received information in accordance with the procedure defined by the local regulations of MC Delo and the affiliated companies of MC Delo.

If any fact of violation of human rights is confirmed, measures are taken to eliminate the causes of violation, mitigate consequences and hold the guilty employees liable.

5.4. The Delo Group of companies guarantees confidentiality with respect to any employee or third party that reports a potential violation of human rights as far as it is compliant with implementation of the Policy. Such report can be delivered on an anonymous basis at the request of applicant.

6. Terms and definitions

Human rights - inalienable rights of all people, regardless of race, skin color, gender, language, religion, national or social origin, or any other aspect. Human rights include the right to life and liberty, freedom from slavery and torture, freedom of opinion and expression, the right to work and education, etc.

Forced or bound labor - all types of work or services that are forcibly required from any person under threat of punishment and for the performance of which such person does not offer his services voluntarily. (Article 1.1 of ILO Convention No. 111).

Discrimination - the term "discrimination" includes both direct and indirect discrimination, respectively: a) any distinction, exclusion or preference based on race, skin color, gender, age, sexual orientation, religion, political views, national or social origin, resulting in elimination or restriction of equality of opportunity (b) any distinction, exclusion or preference resulting in elimination or restriction of equality of opportunity or deterioration of attitude towards a person when hiring or performing certain jobs (Article 1.1 of ILO Convention No. 111).

Association - any group of individuals and/ or legal entities gathered together in order to collectively act and express, promote, implement or protect common interests in some area. Some common types of associations include civil society organizations, clubs, cooperatives, NGOs, religious associations, political parties, trade unions, foundations, and online associations.

Right to freedom of association - the right to form or join groups of like-minded people and to pursue common interests. Groups can be formal or informal; in order for the right to freedom of association to apply, no registration of association is required. Two people are enough to form an association.

A collective agreement - a legal act regulating social and labor relations in organization or with individual entrepreneur and executed by employees and employer acting through their representatives.

Local community - a community of people living in a certain territory and united by common interests in solving life issues through the use and development of local material and social resources on the principles of self-government.

Harassment - a violation of personal boundaries and subordination, solicitation, humiliation and violation of privacy.

7. Final provisions

7.1. This Policy shall be put into effect, amended and canceled by order of the general director.

7.2. This Policy is subject to revision if changes are made to:
the existing legislation of the Russian Federation;
internal regulatory documents of the Company.

7.3. This Policy shall be updated by the legal service of MC Delo.

7.4. Employees of the legal service of MC Delo have the right to provide explanations on the issues of application of this Policy.

7.5. Control over fulfillment of the requirements of this Policy is imposed on the Director for Legal Affairs being the chief of legal service of MC Delo.

7.6. If a reference is made in the text of this Policy to any document that has been amended after the date of approval of this Policy, it is required to use the current version of this document. If a reference is made in the Policy to any cancelled document, the relevant section of the Policy shall be applicable to the extent not affected by the reference to such void document.
