



EUROCHEM

Whistleblower Policy

C6.PLC.01
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Summary

NAME	Whistleblower Policy
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PROCESS SUPERVISOR	A.A. Ilyin, Chief Financial Officer, EuroChem Group
PROCESS OWNER	V.V. Sidnev, General Counsel, EuroChem Group
DEVELOPED BY	E.V. Kholmanskikh, Chief Compliance Officer, EuroChem Group
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Revision history

Version	Effective date	Purpose	Revision details
1.0	03.09.2018	Board of Directors Decision	N/A

Contents

1. Terms and definitions	4
2. Purpose and Applicability	6
3. Principles	6
4. Whistleblower System (WBS)	6
4.1. Scope	6
4.2. Process	7
4.3. EuroChem’s obligations to whistleblowers	7
5. Policy review	7
Annex 1 Reference list	8

1. Terms and definitions

Term	Definition
Authorized Persons	The persons permitted to handle, investigate and/or supervise a whistleblower's Concern as determined by the relevant Compliance Officer on a case-by-case basis.
WBS data center specialists	The persons receiving and collecting concerns from whistleblowers
Anonymity/ confidentiality	The principle of non-disclosure of specific information, such as the identity of a whistleblower. The Reporting Officer and all other Authorized Persons must protect the whistleblower's identity and other details of the Concern, as well as the details of the Investigation, by sharing this information only with other Authorized Persons on a strict 'need to know' basis.
Concern	A report raised by a whistleblower about an actual or suspected non-compliance or misconduct within EuroChem that involves or could involve a violation of any EuroChem policy, its contractual obligations, and/or any law, regulation or code.
Good Faith	A Concern is reported in Good Faith when the Concern is not raised maliciously and when it is based on reasonable facts and/or circumstances that allow for the assumption that the Concern is sufficiently grounded and not intended to mislead.
Group Management	Senior executives of the Group, including the Chief Executive Officer (CEO), any member of the Management Board, General Counsel, Head of Corporate Security, and the Head of Compliance.
Retaliation	Any adverse action taken against a whistleblower by another employee, manager or representative of the Group as a result of reporting a Concern, or against any other employee who provides information, who causes information to be provided, or who otherwise assists in investigative procedures. Examples of adverse actions could include, but are not limited to, harassing, threatening, firing or demoting, transferring to another part of the organisation or changing responsibilities.
Investigation	The process of examining and verifying information provided by a whistleblower and the audit or inquiry procedure set up to do this. The aim of the investigation is to get to the bottom of a Concern, uncover its causes and extent, and learn any applicable lessons to prevent any recurrence and minimize potential negative consequences

	for the Group, its employees, beneficiaries, third parties and other stakeholders.
Whistleblower System (WBS)	A special communications channel set up to enable the reporting or alerting of a Concern, in accordance with this Policy.

2. Purpose and Applicability

- This Policy establishes a communication system to enable all Group employees to reach the Group Management and report in Good Faith any or suspected Concerns or potential breaches, possible dangerous situations or suspected violations, which may have negative material consequences, such as damage to the reputation or positive image of the Group or any member of the Group, and/or potentially cause harm to any Group employees.
- This Policy shall be introduced and implemented by all members of the Group.
- This Policy will apply to all employees and members of the Group in all areas and jurisdictions of the Group's global business activities.
- The Company and the members of the Group guarantee protection from retaliation, for any employee who reports a Concern in Good Faith, provides information, causes information to be provided or otherwise assists in verification and investigation procedures.

3. Principles

This Policy, and the Whistleblower System of the Group, is based on the following principles:

- Open communication;
- Awareness;
- Transparency;
- Anonymity and confidentiality;
- Good Faith;
- No retaliation.

4. Whistleblower System (WBS)

4.1. Scope

Employees can access the WBS to report Concerns or potential breaches they may have in the following ways:

- WBS Hot Line mail box: whistleblower@eurochemgroup.com
- WBS Online channel (anonymous) at www.eurochemgroup.com/wbs
- WBS Hot Line to leave a recorded message: +800 80 80 60 60

All information received through the WBS channels shall be processed and verified as prescribed below. Unnecessary or invalid information shall be deleted.

4.2. Process

All whistleblowing reports received through the WBS are recorded, assessed individually and dealt with on a case-by-case basis.

Reports are first screened by an Authorized Person within the data center to ensure that they are relevant. If relevant, they are then passed on to the relevant Authorized Person or to the Compliance Officers for detailed investigation.

The Group will maintain a list of Authorized Persons with the authority to review reports within the data center and to manage the rest of the WBS procedure.

4.3. EuroChem's obligations to whistleblowers

EuroChem has the following obligations to a whistleblower:

- provide easy and anonymous access to the WBS;
- protect whistleblowers from Retaliation;
- respect and maintain whistleblowers' confidentiality and anonymity;
- adequately investigate and verify Concerns and information provided in Good Faith;
- maintain and keep the WBS in workable condition;
- safeguard all necessary information.

5. Policy review

This Policy shall be reviewed by EuroChem's Compliance Function at least annually in order to ensure that it remains up to date and in line with all applicable rules and legislation.

Annex 1 Reference list

Nº	ID	Name	Link
References			
1		Compliance Policy EuroChem Group AG	Compliance Policy
2		Code of Conduct EuroChem Group AG	Code of Conduct