

APPROVED BY
order of PJSC TransContainer
dated November 2, 2022 No. ЦКП/2022-290

Human Rights Policy of PJSC TransContainer

1. General Provisions

1.1 This Policy determines the position of PJSC TransContainer (hereinafter referred to as the “Company”) regarding the observance of human rights.

1.2. This Policy declares the Company's commitment to observance of human rights and intolerance to all types of discrimination in accordance with the generally accepted principles and standards of international law and in accordance with the Constitution of the Russian Federation. This Policy contains the basic principles of human rights protection, as well as warranties that human rights are observed in all the areas of activities of the Company.

1.3. The Company uses its best efforts to prevent and eliminate violations of human rights, if such are identified.

1.4. This Policy shall be considered in conjunction with the Code of Business Conduct of PJSC TransContainer and other relevant local regulatory documents of the Company.

1.5. This Policy has been developed in accordance with the Universal Declaration of Human Rights, the International Covenant on Civil and Political Rights, the International Covenant on Economic, Social and Cultural Rights, the conventions of the International Labor Organization (ILO), the Constitution of the Russian Federation and the Labor Code of the Russian Federation.

2. Terms and Definitions

Forced labor shall mean all work or service which is exacted from any person under the menace of any penalty and for which the said person has not offered himself voluntarily (Article 2 of ILO Convention No. 29).

Discrimination shall mean any distinction, exclusion or preference made on the basis of race, color, sex, religion, political opinion, national extraction or social origin, which has the effect of nullifying or impairing equality of opportunity or treatment in employment or occupation, including access to vocational training, access to employment and to particular occupations, and terms and conditions of employment (Article 1 of ILO Convention No. 111).

Association (union) shall mean an association of legal entities and (or) individuals, based on voluntary or, where provided for by the law, on mandatory membership and established to represent and protect common interests, including professional interests, to achieve socially useful objectives, as well as other non-commercial objectives that do not conflict with the law.

Local community shall mean the population, people altogether living in the same territory and united by common interests in solving issues of daily living through the use and development of local physical and social resources based on the principles of self-government.

Harassment shall mean violation of personal boundaries and subordination, sexual advances, humiliation and invasion of personal privacy.

3. Scope and Purpose of this Policy

3.1 This Policy is the framework document of the Company and applies to all types of activities of the Company.

3.2. The purpose of this Policy is the full observance of human rights and freedoms in accordance with the generally accepted principles and standards of international law, the Constitution of the

Russian Federation.

3.3. This Policy contains the basic principles of the Company's approach to the protection of human rights, as well as warranties for the observance of human rights in all areas of activity. Upon identification of violations of human rights, the Company takes appropriate action to prevent and eliminate the same.

3.4. The Company adheres to the principles set forth in Section 4 of this Policy in relations with:
employees of the Company;
counterparties of the Company (suppliers, contractors, associate contractors);
customer of the Company;
local population in the regions of operations of the Company;
and other parties concerned that are affected by the Company's activities.

4. Human Rights Principles

4.1. The Company in its activities agrees to comply with the laws of the Russian Federation, as well as generally accepted human rights. This Policy determines the principles with regard to human rights, which the Company considers the most important, taking into account the specific character of the Company's activities and regions of operations, as well as approaches to preventing and minimizing the risks of violations of human rights. Therewith, observance of human rights is not limited to the principles referred to in this section.

4.2. The Company agrees to adhere to the following principles:

4.2.1. The principle of freedom of labor. Each person has the right to freely dispose of own abilities to work, to choose the occupation and profession. Forced labor is prohibited. Each person has the right to work in conditions that meet the requirements for safety and hygiene, the right to rest, the right to protection against unemployment.

4.2.2. The principle of non-discrimination. Prohibition of forced labor and discrimination in employment. The Company rejects any form of discrimination, harassment, offences, physical violence, verbal abuse, sexual misconduct or psychological pressure, threats or intimidation in and outside the workplace and is committed to ensuring that its employees are treated with respect, as well as to create equal opportunities, both at the beginning of employment relations, and at each of their stages.

4.2.3. The principle of respect for human rights and fundamental freedoms, including freedom of conscience, religion, thought and belief. Equal access to opportunities and fair remuneration.

When determining remuneration, the principles of decent wages and the payment of equal remuneration for men and women for work of equal value and complexity are taken into account on the basis of an objective appraisal of jobs on the basis of the work to be performed (ILO Convention No. 100).

The minimum compensation (salary) of the Company's employees cannot be lower than the minimum wage established by the legal acts in force in the regions of the Company's operations, in accordance with the provisions of the ILO Conventions.

The Company acknowledges the importance of occupational guidance and training for the development of labor resources and skills of employees by improving the forms of engagement and participation of employees and their representatives.

4.2.4. Compliance with the applicable laws in health and safety, industrial security and environment. The Company has a responsible attitude to ensuring a high level of health and safety at the workplace, supports expansion and strengthening of a safety culture by raising awareness of employees on the risks, the behavioral safety, binding obligation of observing the same and training. The Company strives to maintain health and ensure safety of its employees, as well as the interests of other parties concerned, in particular through the use of preventive actions.

4.2.5. Observance of the rights of employees to freedom of assembly and association. The Company acknowledges the right of its employees to form and participate in organizations providing protection and support of their interests, and does not influence their decisions.

4.2.6. Respect for the rights, cultural sensitivity and customs of local communities in the regions of the Company's operations, including indigenous minorities. The Company, when carrying out its activities, strives to improve the quality of life and well-being of local communities living in the regions of the Company's operations, and seeks to have a positive impact on their social and economic development.

4.2.7. Intolerance to corruption.

4.2.8. Personal privacy, confidential treatment. The Company observes the confidential treatment in relations with contractors and the right to privacy of employees and consistently follows the principles of proper use of information and data provided to the Company.

5. Reports of Human Rights Violations

5.1. For the purposes of improving the level of corporate governance, timely detection of possible violations of human rights in relation to the Company's employees, as well as responding to such violations, the Company has a round-the-clock toll-free line, by contacting which an employee or any other person can in a convenient form report known cases of violations of human rights.

5.2 Reports of possible violations of human rights can be communicated as follows:
through an operator of the Company's contact center by phone number 8(800)100-22-20;
via the Hotline communication channels on the official website of the Company or on the internal website of the Company;

via email to trcont@trcont.com ;

to the line manager or, in case such manager is suspected of violation of human rights - to any hierarchical superior

by other available means not contradicting the laws of the Russian Federation and the Company's by-laws.

5.3. The Company verifies the received information pursuant to the procedure provided for by the by-laws of the Company.

In case the fact of violation of human RIGHTS is confirmed, the company shall take measures aimed at elimination of the causes of violation, mitigation of effects thereof and holding liable any employees in default.

5.4. The Company warrants confidentiality in relation to an employee or a third party who has reported a possible violation of human rights, to the extent that this conforms to the fulfillment of this Policy. At the request of a whistleblower, such report may be made on an anonymous basis.

6. Implementation of the Policy and Compliance Control

Responsibility and control over the compliance with the requirements of this Policy shall be imposed on the Chief HR Officer.
