

Ethical practices

GRI 2-23, 2-24

VALUES, PRINCIPLES, STANDARDS AND NORMS OF BEHAVIOUR

PhosAgro Group has a well-deserved reputation of a reliable business partner, attractive employer, responsible taxpayer, and partner to the Russian government and regions where the Company operates. The trust that our investors, employees, customers, contractors and authorities place in the Company is underpinned by the high ethical standards that we have adhered to since PhosAgro’s inception.

We take an integrated approach to business ethics; in other words, we believe that ethical considerations are intrinsic to all aspects of our operations, from procurement and teamwork to safety and trade. We systematically analyse risks in this area and develop and implement measures to manage them.

To achieve the above, we need to ensure that our ethical principles and standards are clearly defined and communicated to employees and counterparties. We also need to have relevant legal, organisational and informational mechanisms in place to support and, more importantly, monitor compliance with these principles and standards, which should also be overseen at the highest corporate governance level.

By consistently implementing this approach for years, PhosAgro has been able to become a company operating to the highest global standards in human rights, industrial

safety, environmental protection, anti-corruption, etc. We recognise that it is hardly possible to fully eliminate ethical risks in a large and diverse organisation that has an almost global presence. We believe that by adhering to our ethical principles and standards we minimise unnecessary risks, maintain our business reputation and keep ourselves on track to achieve our ambitious production and financial targets for the benefit of PhosAgro’s shareholders and other stakeholders.

Management approach

PhosAgro Group does its best to eliminate violations of human rights, corrupt practices, and other instances of non-compliance with corporate ethical principles. This helps us enhance and protect our reputation as an honest, open, and bona fide company among shareholders, investors, employees, and clients, while minimising the risk of legal consequences or sanctions against the Group companies and their officers. Elimination of any possible occurrences bearing the signs of the above, and strengthening the commitment of PhosAgro Group’s employees to the highest ethical standards are at the forefront of the Group’s activities.

To ensure PhosAgro Group’s observance of ethical practices and generally recognised business standards, the Company put


in place an anti-fraud and anti-corruption system fully covering all areas of operation. We developed and adopted a set of corporate, legal, information and educational measures to strengthen our shared corporate culture underpinned by high ethical standards and maintain an atmosphere of trust, mutual respect and integrity among employees. All controlled entities of PhosAgro approved anti-corruption standards. Our implemented anti-corruption measures were in line with the Anti-Corruption Plan for 2022–2024.

Ethical standards and norms of behaviour

The principles and standards of ethical behaviour when working at and with PhosAgro are set out in relevant policies and other internal documents listed below. These are regulatory documents all the Group’s managers, officers and other employees must comply with. Employees who have violated them are subject to the respective sanctions, including social condemnation, public censure through publication in the corporate media, full or partial withholding of bonuses, and – if the employee’s action (omission) bears signs of a disciplinary offence – disciplinary measures also apply to such employee pursuant to the applicable labour and employment laws.


The following internal regulations governing the compliance of the Company with the key principles and standards of ethical conduct are currently in effect:

SASB EM-MM-510a.1, RT-CH-530a.1




Code of Ethics

The Code outlines the key principles and rules of ethical business conduct underlying the corporate culture of PhosAgro




Corporate Governance Code

The Code defines the main principles of and approaches to corporate governance




Code of Conduct for Counterparties

The Company may refuse to cooperate with suppliers or business partners discriminating their own or subcontractors’ employees or using forced labour




Anti-Corruption Policy

The Policy defines the goals and objectives and sets forth the Company’s key principles and employee responsibilities in the sphere of anti-fraud and anti-corruption



Regulations on Conflict of Interest

The Regulations establish the procedure for identifying and resolving conflicts of interest arising with employees in the course of their employment




UK Modern Slavery Act Transparency Statement

The Act outlines the Company’s actions to prevent all forms of modern slavery and human trafficking within PhosAgro and its supply chain



Regulations on the Commission for Combating Fraud and Corruption and Regulating Conflicts of Interest

The Regulations address and govern the issues pertaining to employee anti-corruption compliance



Regulations on Internal Checks



Regulations on Inspections

The regulations govern a set of actions taken to elicit the facts and identify the circumstances, motives and conditions of misconduct, incidents, and other violations of requirements set out in the Company’s internal regulations




Regulations to Ensure Compliance with Anti-Corruption Laws as Part of Legal Support Process

The Regulations outline goals and objectives for legal support of the Company’s business processes and transactions involving a high risk of corruption




Personnel Management Policy

The Policy sets forth the Company’s and its management’s adherence to high ethical standards of transparent and fair business aimed at building the image of an employer attractive for the best professionals




Apatit’s Procurement Policy

The Policy defines the goals, key principles, roles and employee responsibilities in procurement




Regulations on Business Presents and Representation Expenses

The Regulations set out the procedure for receiving presents by the Company’s employees , as well as making them on behalf of the Company. The Regulations substantiate and detail the formation, structure, and documentation of representation expenses



Government Relations Policy

The Policy establishes the principles, areas, purpose and objectives of PhosAgro interaction with public authorities and officials



Charity Policy

The Policy sets out the key principles and areas for providing charitable support on behalf of and through the funds of the Company

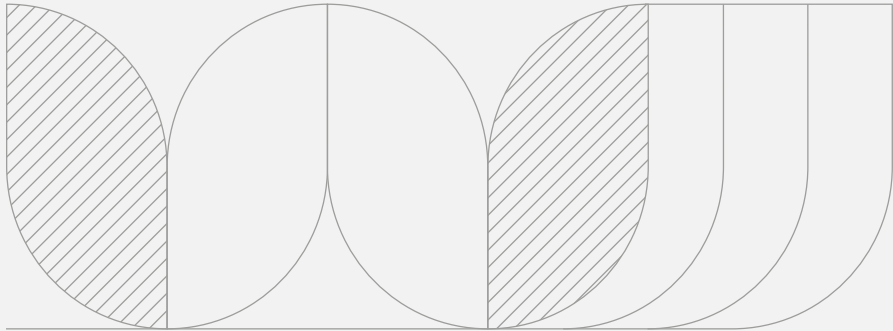


PhosAgro Hotline Regulations

The Regulations set out the goals and objectives with regard to the receipt of employee reports on the matters pertaining to combating fraud, corruption and theft and identifying conflicts of interest

ORGANISATIONAL AND INFORMATIONAL MECHANISMS IN PLACE TO ENSURE COMPLIANCE WITH ETHICAL PRINCIPLES AND STANDARDS

PhosAgro Group has a well-designed set of tools in place to ensure that the Group's employees and counterparties are kept abreast of and trained in ethical business practices and that cases of potentially unethical and corrupt behaviour are effectively reported to relevant officers and units.



Tools to notify the relevant PhosAgro Group executives of any instances of misconduct and corrupt practices

GRI 2-25, 2-26

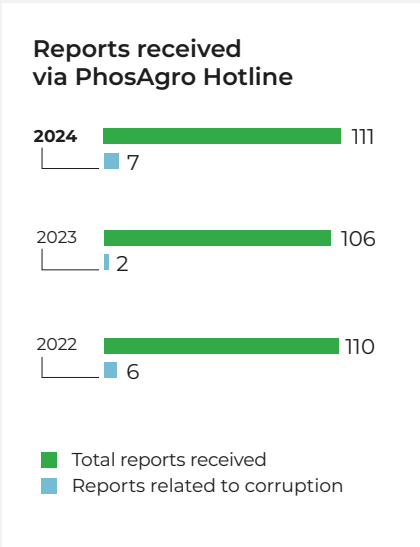
Tool	Description
Obligation	<p>Any Company employee , as well as any member of the Board of Directors, who has become aware of any actual or potential violation of law or PhosAgro's internal regulations is obliged to give a prompt notice of the same in writing.</p> <p>This also applies to any inducement to corruption or violations showing signs of corruption committed with respect to other employees, counterparties or other parties interacting with the Group.</p>
Communication	<p>The procedures for reporting and reviewing violation reports are defined in the Anti-Corruption Policy, the Code of Ethics, the Regulations on Conflict of Interest, and the Anti-Corruption Agreement¹, as well as Apatit's Order No. 9-U On Improving the Procedure for Reporting Economic Security Violations to Management of Apatit, its Subsidiaries and Affiliates dated 10 January 2024.</p>
Confidentiality and protection	<p>A person who has submitted a notice/report is guaranteed confidentiality of the information received, as well as such person's personal data. PhosAgro takes steps to protect the employee who has notified the employer's representative (employer) of any actual or potential violation of law and the Company's internal regulations.</p>
Advice	<p>PhosAgro's Code of Ethics formalises the right of each employee, if they have any questions relating to anti-corruption compliance or any concerns as to the rightness of their actions the actions of other employees, counterparties, or other parties interacting with the Company, to seek advice or assistance from their immediate supervisors and/or respective business units (officers) of the Company in line with their remit.</p>
PhosAgro Hotline	<p>The Hotline is in place to improve the efficiency of measures taken to prevent fraud, corruption, theft, and conflict of interest, as well as to mitigate compliance and reputational risks resulting from the violation of professional and ethical standards by PhosAgro Group's employees. There are several ways to report to the Hotline:</p> <ul style="list-style-type: none">• by phone at +8 8202 59 32 32;• by e-mail help@phosagro.ru;• by regular mail at the following address: Economic Security Department, 75 Severnoye Highway, Cherepovets, Vologda Region, 162625, Russia.

¹ Appendix No. 1 to the Anti-Corruption Policy.

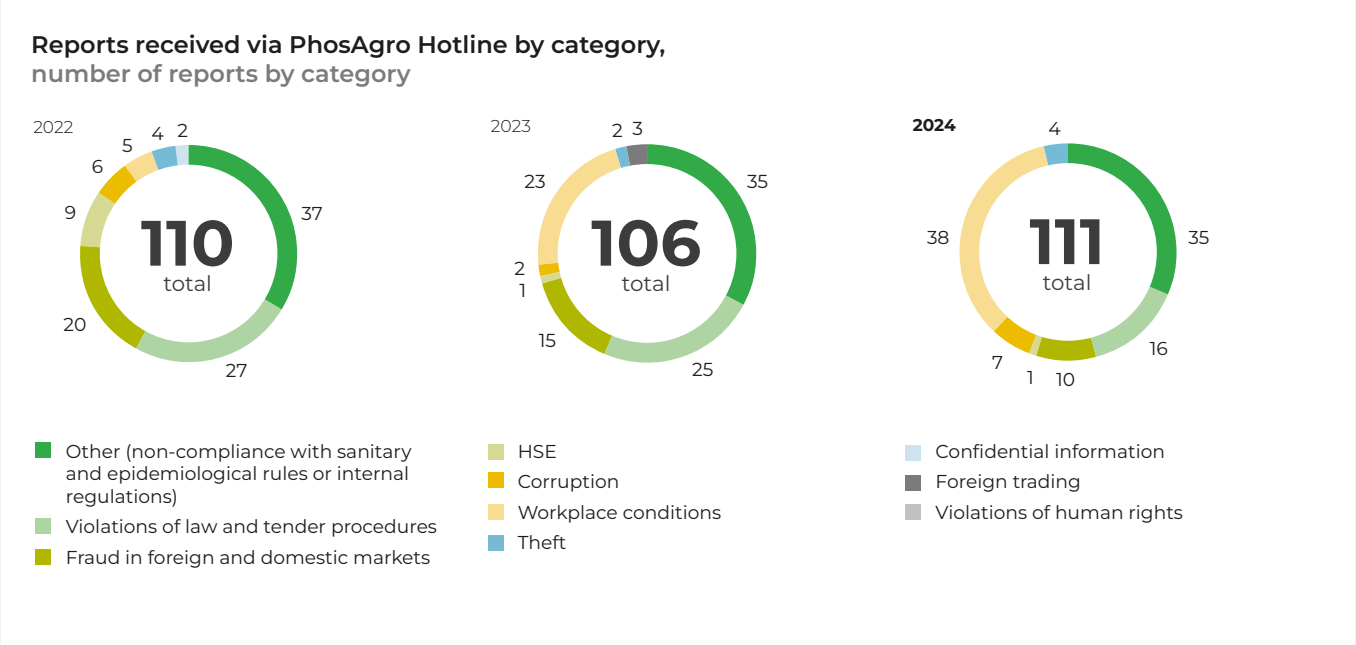
PHOSAGRO HOTLINE

To improve the timeliness and effectiveness of measures aimed at preventing ethical violations, including corruption, discrimination, human rights violations, etc., the Company created the PhosAgro Hotline portal.

Any employee or other stakeholder can use PhosAgro Hotline to report any potential violations detrimental to the Company's interests, while the Company may not disclose the identity of the whistle-blower to other employees and third parties.



✓ In 2022–2024, there were no employee reports or complaints about violations of labour practices, human rights, or discrimination.



The register of submissions received via the PhosAgro Hotline over the past three years shows that there has been no increase in the total number of reports received. 29% of submissions came from Company employees, with their concerns primarily focused on labour issues, workplace relationships, and interactions with business unit management that all fall under Workplace Conditions category. 15% of the submissions were from Company contractors providing feedback on the potential inefficiencies in the tender committee performance. These were typically submitted following unsuccessful attempts to participate in bids for providing services or work. 9% of the submissions originated from potential buyers of the Company's products (mineral fertilizers), who had encountered fraudulent activities by unidentified individuals falsely representing the PhosAgro Group brand.

The review of submissions received in 2024 revealed that in 55 cases, the information provided could not be reliably verified. In 41 cases, the reported information was confirmed, while 15 cases were subject to ongoing verification

activities. The number of anonymous submissions increased 2.5 times (from 9 to 23), but only three of them were found to be substantiated, all related to misconduct by managers. In all cases, discussions were held with the workforce, and employee surveys were conducted by the HR and Social Policy Department.

✓

PhosAgro's Internal Audit Department reports on a quarterly basis to the Audit Committee on all reports received by the PhosAgro Hotline, actions taken, the results of audits and measures to address violations of the Group's ethical standards. The Chairman of the Audit Committee provides this information to members of PhosAgro's Board of Directors.

HUMAN RIGHTS

<div></div> <p>PhosAgro's Code of Ethics recognises labour rights as integral part of human rights. In its operations, PhosAgro Group respects labour rights of employees as provided by law, recognises the right of employees to decent remuneration, helps prevent any form of discrimination and forced labour, and supports employee participation in key matters pertaining to the Group's development.</p> <p>The Company implements personnel development programmes that provide for employee training and personal growth and offer social benefits, incentives, and leisure and recreation opportunities.</p>	<div></div> <p>PhosAgro Group encourages family generations of employees and corporate traditions that help retain teams, improve labour discipline, performance, and morale.</p> <p>The Group supports professional and personal growth of its employees. The key goal here is to create a talent pool of professionals with strong knowledge of theory and practical skills required to support the operations of PhosAgro Group's sites.</p>	<div></div> <p>PhosAgro is committed to respecting employees' rights as required by the International Bill of Human Rights and the ILO Declaration on Fundamental Principles and Rights at Work, including zero discrimination, not using child or forced labour, respecting their right to exercise freedom of association and collective bargaining, and creating a safe and favourable working environment for both its own employees and the employees of its contractors, which are also expected to comply with such requirements and regulations.</p>	<div></div> <p>The Company's internal documents that govern human rights compliance include the following documents:</p> <ul style="list-style-type: none">• <u>Code of Ethics</u> (clauses 3.3, 4.1 and 5.2);• <u>Personnel Management Policy</u> (clause 5.8);• <u>Code of Conduct for Counterparties (in terms of requirements related to human rights compliance)</u>;• <u>UK Modern Slavery Act Transparency Statement</u>.	<div></div> <p>PhosAgro Group appreciates and encourages diversity among its employees. We provide equal opportunities for them to unlock their potential and do not tolerate any restriction of a person's or a group's natural rights and freedoms or any conduct violating privacy of our employees. Each year, the Board of Directors and the Remuneration and Human Resources Committee reviews human rights, focusing on staff diversity and equality of genders.</p> <p>Any decisions regarding promotion, hiring, remuneration, benefits or compensations are based solely on the employee's qualifications, performance, skills and experience assessed impartially and fairly.</p>	<p>We expect our employees to treat their colleagues and everybody else, including customers, suppliers and other stakeholders, with due professionalism, respect and fairness.</p> <p>We consider unacceptable any restriction of employee rights or freedoms, whether at workplace or in any other job-related environment.</p> <p>Since 2013, we have been conducting annual employee surveys enabling each employee to give feedback on the performance of the Company and its management. Throughout the history of such surveys, we have not received any negative feedback or reports of violations of human rights. This clearly indicates that all obligations to PhosAgro's staff are respected and met.</p>
--	---	--	---	--	--

ANTI-CORRUPTION

GRI 3-3, MED 41

We consider it unacceptable for PhosAgro Group’s executives and employees at all levels to take advantage of their official position. To prevent fraud and corruption, PhosAgro has put in place its Anti-Corruption Policy together with a system covering the entire range of its activities, and set up a commission on fraud, corruption, and conflicts of interest. The Company seeks to identify and assess corruption risks on a regular basis to keep track of functions and positions exposed to such risks. PhosAgro also regularly prepares and reviews reports on the progress of anti-corruption initiatives and the performance of the anti-fraud and anti-corruption system.

In addition, we make an ongoing effort to build a culture of zero tolerance to corruption underpinned by high ethical standards, as well as maintain an atmosphere of trust, mutual respect and integrity among employees.

Operations assessed for risks related to corruption

When building an effective anti-corruption policy, it is of utmost importance to understand what corruption offences employees may be inclined to commit depending on their positions, what business processes are most likely to involve the commission of such offences, what ways or schemes are available for committing them and what consequences they may lead to.

For this purpose, the Group has defined lists of corruption-prone functions and positions. PhosAgro¹ and its key controlled entity Apatit² have lists of positions exposed to corruption risks. The activities of employees in these positions are closely monitored by the Economic Security Department and the heads of relevant business units. They evaluate whether these employees adhere to high ethical standards and comply with internal

anti-corruption regulations that outline these standards. Specifically, there is continuous monitoring of compliance with prohibitions and restrictions related to anti-corruption efforts, as well as measures to prevent and address conflicts of interest.

In 2022–2024

0.3136%

of PhosAgro Group employees held positions exposed to high corruption risks

PhosAgro Group seeks to identify and assess corruption risks on a regular basis to update the list of functions and positions exposed to such risks. These efforts entail three key components:



Corruption risk identification

Identification of corruption offences that may be committed by Group employees and detection of business processes (critical points) where such misconduct is possible.



Corruption risk analysis

Identification of ways that can be potentially used to commit a corruption offence, depending on the specifics of the Group’s business processes (corruption schemes), persons who may be involved in corruption, and business processes’ vulnerabilities.



Assessment of materiality of corruption risks

Assessment of the probability of a corruption offence at a specific stage of a business process and the potential damage to PhosAgro Group in case an employee (employees) commits (commit) a corruption offence.

PhosAgro’s Board of Directors receives regular reports on the progress of anti-corruption initiatives and the performance of the anti-fraud and anti-corruption system in accordance with PhosAgro’s Risk Management and Internal Control Policy. In addition, the process of identifying risks and preventing wrongdoings is monitored by line managers on the basis of, among other things, the Risk Management Regulations. The corruption risk is assessed by an independent unit

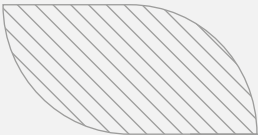
– the Risk Management Methodology Department. For 2024, the corruption risk was assessed as minimal.

Informing, advising, and training employees

GRI 205-2

PhosAgro Group offers ongoing training programmes to educate employees on anti-corruption in order to minimise the risk of their

involvement in corrupt practices. To this end, the Group has put in place a robust training system to prevent any and all corrupt practices, mitigate possible harm, and eliminate the consequences thereof.



Training methodology

MED 42



Target audience

Managers of levels N-1, N-2, N-3, N-4, N-5, as well as managers without assigned levels, white-collar workers, including employees of branches and standalone business units



Goals and objectives

Provide employees with updated information on laws and regulations on detecting and combating corruption in business entities Help students develop an anti-corruption attitude, learn about methods of combating corruption and conflicts of interests and master relevant skills Help students acquire knowledge of the causes and preconditions for corruption and practices of identifying and counteracting such cases



Training results

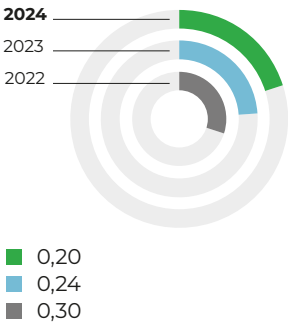
Upon completion of the anti-corruption training, a student should have an understanding of the theory of counteracting corruption in the Group; factors, causes, essence and consequences of corruption; Russian anti-corruption laws and regulations, as well as anti-corruption standards adopted in the Company; responsibility for failure to comply with anti-corruption practices



Benefits of online training

Educational materials (presentations, tests) accurately reflect the potential issues of corruption at PhosAgro Group companies. The training process does not disrupt core business activities

The average duration of anti-corruption training per employee across PhosAgro Group, hours



✓
To train and inform employees, PhosAgro Group annually develops anti-corruption courses with final tests, which are posted on the corporate intranet portal. The themes of the courses depend on the remit (job duties) of business units (employees) and the established system of anti-corruption standards.

¹ Order No. 39 dated 7 April 2022.
² Order No. 486-U dated 10 December 2022.

Completed training programmes

Training period	Completed programmes
2022	Main Goals and Principles of the PhosAgro Group Code of Ethics
2023	Training and Testing of Employees of Apatit, its Branches and Companies Managed by Apatit, in Preventing and Resolving Conflict of Interest
2024	Training and Testing of Apatit Employees on the Principles of the PhosAgro Hotline Operation in line with PhosAgro Group's Anti-Fraud and Anti-Corruption Policy

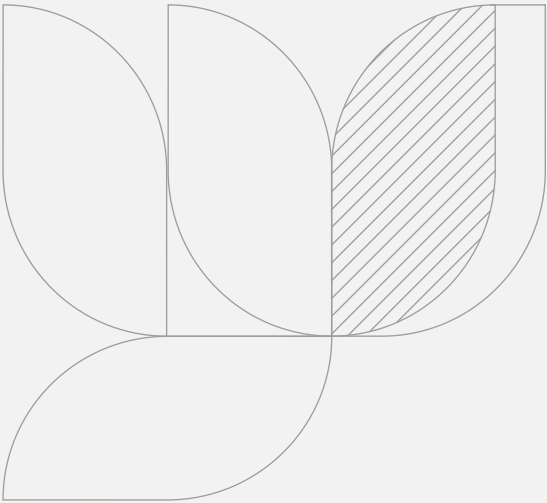
Total number and share of members of governance bodies and employees familiarised with the Company's Anti-Corruption Policy and procedures, by region

Region	Total number of members of governance bodies			Share of members of governance bodies, %			Total number of employees			Share of employees, %		
	2022	2023	2024	2022	2023	2024	2022	2023	2024	2022	2023	2024
Saratov region	234	307	218	83	98	88	747	961	980	88	99	87
Murmansk region	718	861	939	81	79	82	2,275	2,671	7,096	87	86	77
Moscow region	68	91	83	78	71	86	181	215	193	80	78	91
Leningrad region	209	260	21	79	84	88	636	751	128	83	90	74
Vologda region	910	946	992	97	96	98	3,206	3,415	4,135	96	97	94
Other	102	0	2	77	0	100	335	0	36	82	0	90
Total	2,241	2,465	2,255	86	88	90	7,380	8,013	12,568	90	92	83

To implement anti-corruption measures, PhosAgro's Economic Security Department drafts an annual training plan. It includes periodic updates for employees regarding existing internal regulations on anti-corruption, anti-corruption standards, responsibility for failure to comply with them, as well as any amendments and additions to these documents. The Group's management actively engages in these periodic communications, underscoring the importance of adhering to established anti-corruption standards. PhosAgro Group's employees and counterparties have free and easy access to information about the Company's anti-corruption practices. PhosAgro's official website features a special section on anti-corruption, which contains CEO's message about the need to strictly comply with established anti-corruption standards, as well as copies of internal documents aimed at preventing corruption (the Anti-Corruption Policy, Code of Ethics, Regulations on Conflict of Interest and on PhosAgro Hot Line). Internal documents are supplemented by methodological materials (handouts, presentations), which explain in easy terms

the anti-corruption policy, standards of conduct, responsibility, and provide examples of corruption-prone situations that employees may encounter in the course of their employment.

Every new employee receives training on the basic requirements of the Anti-Fraud and Anti-Corruption Policy, the Code of Ethics, Regulations on Conflict of Interest and on PhosAgro Hot Line by watching a respective video and putting their signature in briefing log to confirm the above. Employees' job descriptions stipulate their obligation to comply with anti-corruption standards and PhosAgro Group's internal regulations, as well as to receive respective training. When employees perform functions involving a high risk of corruption, those responsible for the implementation of the Anti-Corruption Policy additionally explain to them the Russian laws and the Group's internal policies on anti-corruption. Employees and counterparties can inquire about the Company's anti-corruption standards through PhosAgro's hotline portal, where they can obtain professional legal assistance and expert clarification.



Total number and share of members of governance bodies, employees and business partners trained in anti-corruption measures, by region

Region	Total number of members of governance bodies			Share of members of governance bodies, %			Total number of employees				Share of employees, %			Total number of business partners			Share of business partners, %		
	2022	2023	2024	2022	2023	2024	2022	2023	2024		2022	2023	2024	2022	2023	2024	2022	2023	2024
Saratov region	283	307	218	33	98	88	852	961	980		67	99	87	104	98	102	100	100	100
Murmansk region	888	861	939	34	79	82	2,621	2,671	7,096		66	86	77	71	85	88	100	100	100
Moscow region	87	91	83	39	71	86	225	215	193		61	78	91	898	852	789	100	100	100
Leningrad region	266	260	21	35	84	88	770	751	128		65	90	74	487	410	435	100	100	100
Vologda region	943	946	992	28	96	98	3,346	3,415	4,135		72	97	94	167	170	174	100	100	100
Other	132	0	2	32	0	100	408	0	36		68	0	90	1,401	1,386	1,951	100	100	100
Total	2,599	2,465	2,255	32	88	90	8,222	8,013	12,568		68	92	83	3,128	3,001	3,539	100	100	100

PhosAgro Group’s participation in collective efforts to combat corruption

PhosAgro Group’s Anti-Corruption Policy is implemented in accordance with applicable anti-corruption laws and international conventions (including the UN Convention against Corruption and Russian anti-corruption laws). PhosAgro Group actively engages with the business community to prevent and combat corruption through participation in various public associations.

PHOSAGRO IS A MEMBER OF RSPP’S SOCIAL CHARTER OF THE RUSSIAN BUSINESS.

PhosAgro and Apatit are listed in the Register of Parties to the Anti-Corruption Charter of the Russian Business.

PhosAgro features in RSPP’s annual Anti-Corruption Rating, which assesses compliance with best business conduct practices both in Russia and globally.

Russian Union of Industrialists and Entrepreneurs (RSPP)

PhosAgro Group’s participation in RSPP initiatives is essential for engaging with government authorities in the regions where it operates and for contributing to the development and implementation of regional economic policy programmes and projects. Through its collaboration with the RSPP, the Group conducts monitoring and self-assessment of its own anti-corruption programmes and practices. These efforts go beyond the Company’s internal activities

to encompass relationships with business partners, engagement with government agencies, procurement processes through open bidding, financial controls, and anti-corruption training for employees.

Anti-Fraud Working Group of the Russian Association of Fertilizer Producers (RAFP)

PhosAgro Group actively participates in the development and implementation of initiatives by RAFP’s Anti-Fraud Working Group, which address illegal activities conducted by unidentified individuals misusing the brands of major mineral fertilizer producers.

Each year, as the preparation for seasonal fieldwork begins, RAFP observes a rise in the activities of unscrupulous organisations established to mislead consumers and unlawfully obtain their funds. To combat this, RAFP proactively informs agricultural producers about fraudulent schemes involving supply contracts for mineral fertilizers that are never fulfilled – often in the names of non-existent entities. Additionally, RAFP clarifies the legitimate purchasing process through the official websites of mineral fertilizer manufacturers, which are listed on the association’s main online platform.

Chamber of Commerce and Industry of Russia (CCI)

As a CCI member, PhosAgro Group actively engages in a dialogue between the business community and the government to forge social, economic, and industrial policies, remove administrative hurdles, improve the business and investment climate, promote entrepreneurship, and ensure adherence to ethical business practices.

Annual anti-corruption legislation knowledge assessment

Each year, employees of PhosAgro Group participate in the All-Russian Anti-Corruption Dictation organised by the Chamber of Commerce and

Industry. This educational initiative aims to raise public awareness about anti-corruption efforts in an engaging and interactive way. The dictation is held annually and consists of 40 questions to be completed within 30 minutes. It includes both general knowledge questions and practical cases that assess participants’ understanding of anti-corruption practices. For Company employees, this serves as an excellent opportunity to evaluate their understanding of anti-corruption laws.

To counteract corruption, we cooperate successfully with state and local government authorities and non-governmental organisations based on the principles of partnership, mutual respect, trust and professionalism. We have entered into a number of long-term agreements on preventing and detecting crime, as well as helping to build security infrastructure through the creation of police stations at PhosAgro Group’s production sites. Joint activities are widely covered in the corporate media.

Informing business partners of PhosAgro Group’s anti-corruption standards and procedures

SASB EM-MM-510a.1

PhosAgro recognises that corruption risks can arise not only within but also outside the Company, primarily when interacting with counterparties, including business partners, suppliers, contractors, etc.

PhosAgro Group has approved a procedure for incorporating an anti-corruption clause and a clause of good faith in every contract signed by the parties. These clauses contain clear and detailed rules and procedures aimed at preventing corruption, including special management procedures, requirements for counterparties, rules

of special anti-corruption control and audit, measures to prevent conflicts of interest and commercial bribery, and compensation for material damage.

The Group is committed to establishing and maintaining business relationships with companies that operate in line with high ethical standards and combat corruption.

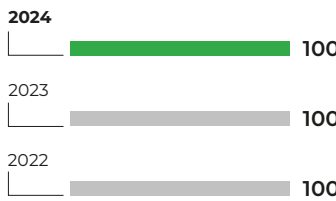
We have improved the registration process at the electronic bidding platform (PhosAgro’s official website – Procurement – Tenders – Supplier Registration Form). Every potential supplier of goods or services interested in establishing a business relationship with PhosAgro Group is required to read the relevant internal regulations (the Company’s Anti-Corruption Policy, Code of Ethics, Anti-Fraud and Anti-Corruption Policy of Apatit, Code of Conduct for Counterparties, etc.), and familiarise themselves with information on PhosAgro’s Hotline. Only after becoming aware of these standards may they proceed with the registration at the electronic bidding platform. This helps to ensure that all potential counterparties seeking to do business with PhosAgro Group are familiar with the applicable standards.

We ensure that all potential counterparties seeking to do business with the Company complete anti-corruption training on the electronic bidding platform.

Total number of business partners registered on the electronic bidding platform and acquainted with anti-corruption standards



Share of business partners in this category, %

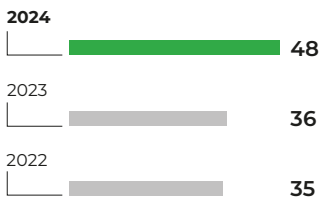


Incidents of corruption identified and actions taken

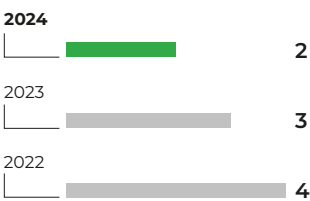
GRI 205-1

Internal investigations into reported corrupt behaviour

Number of internal investigations into various failures to comply with internal regulations



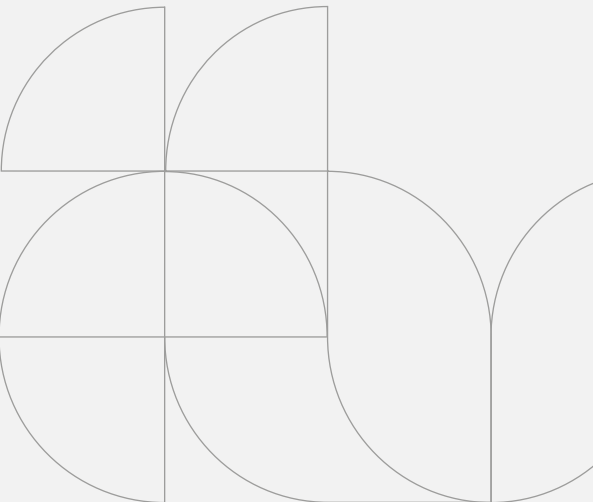
Including corruption-related violations



GRI 205-3

In 2024, a total of 48 internal investigations were carried out to address failures in compliance with the internal regulations. Two of them pertained to the following alleged instances of corruption and fraud:

- illegal receipt of RUB 1,669,000 by the head of section of the Procurement Department at Apatit in exchange for exercising their official powers for the benefit of a contractor (the investigation was launched in 2023 and is still ongoing); the internal investigation has not yet been finalised, with a criminal case opened under Part 8, Article 204 of the Criminal Code of the Russian Federation and investigative actions ongoing;
- illegal receipt of RUB 3.882 mln by the head of section of the OHS Department at Apatit in exchange for unlawful actions; a criminal case has been opened under Part 8, Article 204 of the Criminal Code of the Russian Federation regarding the illegal receipt of RUB 3,882 mln by the head of the fire safety section of the OHS Department in exchange for unlawful actions; investigative actions are ongoing, and the employment contract with the employee has been terminated.



Confirmed incidents of corruption and actions taken

GRI 205-3

Indicator	2022	2023	2024
Total number of confirmed incidents of corruption	4	5	1
Total number of confirmed incidents in which employees were dismissed or disciplined for corruption	3	1	0
Total number of confirmed incidents when contracts with business partners were terminated or not renewed due to violations related to corruption	2	1	0
Public legal cases ¹ regarding corruption brought against the organisation or its employees	2	3	1

PhosAgro Group’s commitment to upholding anti-corruption standards is evidenced, among other

things, through its active engagement with law enforcement authorities, which includes:

- publicly pledging to report to the relevant law enforcement authorities any instances or signs of corruption the Group

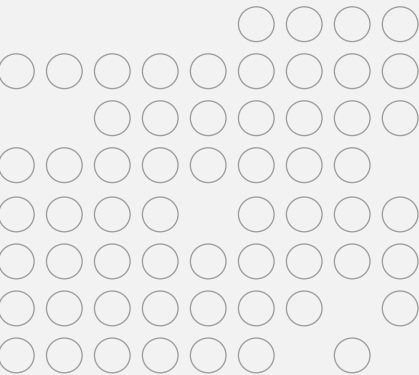
or its employees become aware of;

- ensuring no retaliation against employees who report to law enforcement authorities any actual or potential corruption incidents that they become aware of in the course of their employment.

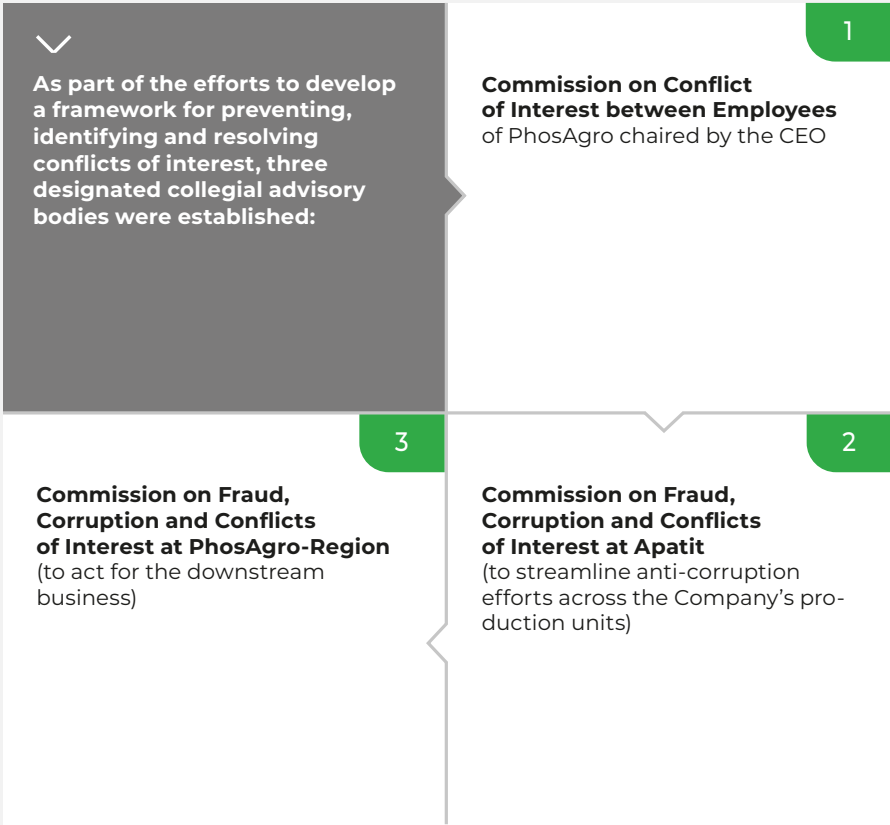
CONFLICTS OF INTEREST

GRI 2-15

PhosAgro’s Code of Ethics and Regulations on Conflict of Interest require employees to report any potential or actual conflicts of interest to their line manager or an anti-corruption officer.



¹ All corruption-related cases are included in the official statistics of law enforcement agencies.



PhosAgro places a strong emphasis on timely prevention, identification and resolution of potential conflicts of interest. The Company puts in place verification procedures to be carried out when personnel decisions are made and responsibilities are distributed and requires all candidates to report personal interest, if any, at the time they are offered employment with the Company and regularly from then onwards.

The Company regularly conducts anti-corruption review of its internal regulations, including orders, directives, contracts, standards, etc. to detect and remedy factors that may lead to anti-corruption law breaches or pose risks to its interests.

The Risk Management and Internal Control Department, an independent body, performs annual internal control exercises to ensure adherence to corruption prevention procedures and frameworks, in accordance with the CEO’s order. The assessment of Apatit’s anti-corruption efforts confirmed alignment with the Anti-Corruption Charter of the Russian Business.

The Company did not identify any conflicts of interest related to joint ownership with suppliers and other stakeholders; controlling shareholders; related parties and their relations, transactions and outstanding balances.

✓ In 2024, a total of 12 potential conflict of interest situations were reviewed. Signs of an actual conflict of interest were confirmed in three cases. As a result, one notice was issued to the management of a business unit regarding possible disciplinary action against an employee, one employee received a reprimand for failing to report an existing conflict of interest, and one member of the Board of Directors was required to resign from their position in the collective governing body of a subsidiary. In the remaining nine cases, no credible evidence of a conflict of interest was found.

Identification, prevention and settlement of conflicts of interest in the actions of PhosAgro Group’s employees

Indicator	2022	2023	2024
Total number of conflict of interest cases pertaining to joint ownership with suppliers and other stakeholders	0	0	0
Total number of conflict of interest cases pertaining to controlling shareholders	0	0	0
Total number of conflict of interest cases pertaining to related parties and their relations, transactions and outstanding balances	0	0	0
Total number of conflict of interest cases pertaining to membership in the Board of Directors	0	0	1
Total number of potential conflict of interest cases	15	10	12
Number of conflict of interest cases considered at the meeting of the Commission on Fraud, Corruption and Conflicts of Interest	9	6	9

LEGAL ACTIONS FOR ANTI-COMPETITIVE BEHAVIOUR, ANTI-TRUST, AND MONOPOLY PRACTICES

GRI 3-3, 206-1

The Company has approved trade policies for the sale of phosphate rock (Apatit’s Marketing Policy for Domestic Sales of Phosphate Rock) and for the sale of certain fertilizer grades to agricultural producers.

There are no pending lawsuits filed on charges of breach of applicable antitrust laws, or any similar lawsuits settled in 2022–2024 to which the Company could be identified as a party.



The respective documents are available in the Our Products section of the [Company’s website](#)