

AFI Development – Human Rights Policy

AFI Development PLC (together with its subsidiaries – “AFI Development” or the “Company”) believes in the importance of supporting and enforcing fundamental principles of human rights in every aspect of Company’s business activities. Our policy on human rights (thereafter, the “Policy”) closely follows the principles set by the United Nations Universal Declaration on Human Rights. At the same time, it adheres to the applicable laws and regulations of the countries of its presence.

Our approach

Respect for dignity, fundamental freedoms and human rights of our stakeholders constitute an underlying basis for our business values as outlined in AFI Development’s Code of Ethics. The Policy shall be considered inseparable from the guiding principles stipulated by our Occupational Health and Safety, Anti-Bribery and Corruption, Whistle Blowing and CSR Policies.

Our commitment to human rights includes the recognition of the principles as set forth in the following international standards and documents:

- Constitution of the Russian Federation;
- Labour Code of the Russian Federation;
- UK Human Rights Act;
- Constitution of the Republic of Cyprus;
- The Cypriot Equal Treatment at work and Employment Law;
- Universal Declaration on Human Rights;
- The United Nations Guiding Principles on Business and Human Rights;
- The International Labour Organisation’s Declaration on Fundamental Principles and Rights at Work; and
- UN Global Compact.

Principles

Company has set a number of core principles, which translate our commitment to the human rights into tangible results and act as an integral part of the Company’s strategy and overall sustainability approach.

In every aspect of our business activities:

- We condemn any form of discrimination based on race, gender, age, religious beliefs, ethnicity, social status, sexual orientation or any other characteristic;
- We condemn sexual harassment;
- We encourage diversity of our workforce;
- We strive to ensure safe and healthy working environment that meets all relevant requirements;
- We recognize freedom of expression and respect human dignity;
- We seek to work with contractors, suppliers and other business partners, who adhere to the same human rights principles and successfully implement them;
- We aim to minimize potential adverse human rights impacts linked in any form to our business operations;

- We engage with stakeholders to discuss and resolve any issues, which challenge the principles of our Human Rights Policy.

Implementation

The Policy is embedded into every aspect of Company's business activities, with the following actions being prioritized as consistent with the United Nations Guiding Principles on Business and Human Rights:

- Build awareness of key human rights principles to employees via communication of the current Policy and its updates;
- Provide focused training to our employees on issues related to human rights;
- Establish human rights due diligence to ensure that no adverse impacts are caused by business relationship and that all concerned parties act in accordance with rigorous standards;
- Encourage our suppliers to take personal responsibility for ensuring that business complies with the principles of our Human Rights Policy;
- Continually monitor and evaluate evolving human rights conditions in the jurisdictions in which our Company operates and update guiding principles to reflect these changes;
- Engage in dialogue with concerned stakeholders in assessing and addressing adverse human rights impacts via the following means: feedback drop-in boxes, mail, e-mail, hotline, internal roundtables and meetings with external stakeholders;
- Provide adequate grievance mechanisms to receive, assess and respond to human rights complaints or queries from any stakeholder without any prejudice, as set by our Whistle Blowing Policy;
- Where a human rights violation is detected, work to provide appropriate remedies and take measures to ensure mechanism's effectiveness;
- Always strive for continual improvement of our business operations.

It is each employee's obligation to ensure adherence to the Policy. The responsibility for overseeing the Policy's implementation, reviewing the management reports on potential human rights issues, and advising on measures to avoid infringing of human rights is delegated to Board of Directors.

This Policy is subject to annual review by the Board of Directors to consider and implement any amendments, if necessary.

Contacts

We welcome queries from our stakeholders. Questions regarding the content and application of the present Policy can be forwarded to our specialists in any convenient form, including telephone and e-mail queries. Contact information may be found on the AFI Development company website.

With respect to incidents of violation of the present Policy or suspicion of such cases, please contact the Manager of Human Resources (Anna Anisimova), Whistle Blowing Manager (General Director – Mark Groysman) and/or Chairman of the Audit Committee (David Tahan).

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Approved by the Board on 25 June 2018.