

Approved by the Resolution of  
the Board of Directors of Segezha Group  
PJSC  
on April 9, 2021, Minutes No. 10/21

**RISK-BASED MANAGEMENT  
POLICY  
OF SEGEZHA GROUP**

MOSCOW  
2021

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## **1. Scope of Application**

1.1 This Policy is an internal document of Segezha Group PJSC (hereinafter referred to as the "Company") and defines the main areas and procedure for integrating risk management elements into activities aimed at achieving the operational and strategic goals of the Company and entities of Segezha Group<sup>1</sup> (hereinafter also referred to as "Segezha Group," the "Group"), as well as sets requirements for the principles of business process organization to ensure coordinated actions for risk-based management of the organization (risk-based management).

1.2 This Policy has been developed taking into account the requirements of Russian laws, the international standard ISO 31000 and the Russian standard GOST R ISO 31000 and takes into account the best international practices, as well as the specific features of the business carried out by Segezha Group.

## **2. Responsibility for Application**

2.1 The following officials shall be aware of and apply this Policy in their work:

- President;
- Vice Presidents of departments;
- Vice Presidents of divisions;
- Heads directly subordinate to the President;
- Heads of subsidiary companies ("SCs");
- Head of structural units ("SUs");
- Employees and line managers of SCs and SUs.

2.2 The Risk Director is responsible for the development, revision, and modification of this Policy.

2.3 The provisions of this Policy are binding on the Company and the Organizations of Segezha Group.

2.4 The elements of business processes and risk management procedures provided for and implemented in accordance with this Policy shall be approved within the framework of the relevant business process regulations and in regulatory documents in accordance with P 006.

2.5 Heads of enterprises and structural units (responsible officers and participants in business processes by function) in all companies and organizations of Segezha Group shall be personally responsible for compliance with the requirements of this Policy, as well as for the actions of their subordinate employees in terms of compliance with the requirements set out in this Policy.

## **3. Purpose of the Document**

3.1 This Policy aims to achieve the following purposes:

- Reinforcement of commitment to risk-based management (risk-based management of the organization) at the level of Segezha Group's senior management;
- Reinforcement of the policy of applying risk-based management to create and protect the value of Segezha Group;
- Reinforcement of the main provisions (principles) of risk-based management;
- Determining the approaches, methods, mechanisms, and procedures for integrating risk management elements into business and management processes;
- Determining the roles for the implementation of the principles of coordination, integration, interaction, and distribution of responsibility within the risk-based management of Segezha Group.

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<sup>1</sup> Legal entities whose financial statements are consolidated with the Company's IFRS financial statements and legal entities in which the Company owns, directly or indirectly, more than 50% of the share capital.

## 4. Regulatory References

4.1 This Policy was developed in accordance with the current laws of the Russian Federation, with due regard for international corporate governance practices and the recommendations contained in the following documents:

- ISO 31000:2018. Risk management. Guidelines;
- GOST R ISO 31000-2019 Risk management. Principles and guidelines;
- GOST R 58771-2019 Risk management. Risk assessment technologies;
- GOST R 51897-2011 / ISO 73:2009 Risk Management. Terms and definitions;
- GOST R 51901.7-2017 Risk management. ISO 31000 implementation guide;
- Document (concept) of the Committee of Sponsoring Organizations of the Treadway Commission—COSO 2017 Enterprise Risk Management. Integrating with Strategy and Performance;
- Guidelines for the Preparation of Regulations on the Risk Management System (approved by Order of the Government of the Russian Federation No. ISh-P13-4148 dated June 24, 2015);
- Recommendations on the Organization of Risk Management, Internal Control, Internal Audit, and the Work of the Audit Committee of the Board of Directors (Supervisory Board) in Public Joint Stock Companies (Appendix to Letter of the Bank of Russia No. IN-06-28/143 dated October 1, 2020);
- P 006-2019 Regulations. The Regulatory Documentation Management System (Integrated Management System, IMS);
- PT 014-2016 Policy. Preventing and Combating Corruption;
- P 039-2020 Regulations. On the Risk Committee of Segezha Group;
- STO 029-2016 Organizational Standard. The Insurance Procedure in Segezha Group.

## 5. Terms, Definitions, and Abbreviations

5.1 This Policy uses terms and definitions in accordance with P 006 and P 039, as well as those additionally set out below:

term/abbreviation	definition of the term / explanation of the abbreviation
<b>Risk</b>	The impact of uncertainty on the ability to achieve the set goals. The goals of an organization can have different aspects and can be applied at different levels. An impact is a deviation from what is expected. It can be positive or negative, so risk can bring both threats and opportunities. Risk is defined in terms of the " <b>Source of Risk,</b> " the potential " <b>Event,</b> " the " <b>Consequences</b> " of these events, and the " <b>Probability</b> " of the event.
<b>Source of Risk (also Risk Factor)</b>	Certain conditions and/or phenomena that create the possibility of an Event's occurrence. <b>For example,</b> failure to comply with fire protection requirements may result in the occurrence of a Fire Event. Hot and dry weather may be another Risk Factor for a Fire Event.
<b>Event</b>	A future condition, occurrence, or change in a number of circumstances that will directly have Consequences for the organization and/or its goals. An event may occur with a certain Probability as a result of several (related or unrelated) causes (Sources of Risk) and may lead to Consequences (one or more).
<b>Probability (Possibility)</b>	The chance that something may happen, regardless of whether it

term/abbreviation	definition of the term / explanation of the abbreviation
	is established, measured or determined, objectively or subjectively, qualitatively or quantitatively, and whether it is described in general terms or mathematically (e.g. as a probability or frequency over a given time period).
<b>Consequence (Impact)</b>	The result of an Event that affects the organization's goals. A Consequence may be definite or indefinite and have a positive or negative impact on the goals. Consequences can be expressed qualitatively or quantitatively. Any consequences can be exacerbated due to the cascade effect and cumulative effects.
<b>Subsidiary Companies (SCs)</b>	For the purposes of this Policy, enterprises, business units, and legal entities whose financial and operational results are consolidated in the management or financial statements of the Company. Employees and managers of SCs directly carry out business processes and manage related risks. Operational management is carried out within Segezha Group in relation to SCs.
<b>Structural Units (SUs)</b>	Structural units that primarily perform managerial or centralized functions within Segezha Group, such as support and coordination, definition of methodology, and control functions and management within a certain functional area (including, but not limited to, safety, compliance control, internal control, environmental safety, labor protection, etc.).
<b>ERM Unit</b>	A structural unit forming part of Segezha Group PJSC that performs functions within the framework of Integrated Risk Management. ERM (Enterprise Risk Management) is a commonly used term for the Integrated Risk Management concept, including the coordination of risk management at the company level, the use of a single methodology for risk analysis, and the preparation of integrated corporate risk reporting. The ERM concept can also be described as a risk-based approach to enterprise management, integrating planning, operations management, internal control and integrated risk reporting, as well as the organization of risk management performance assessment.
<b>Risk Owner</b>	An official or a mid-level or senior manager who is responsible for achieving the goal(s) affected by a Risk. The Risk Owner shall have the capacity and resources to take Risk Control measures with regard to the Risk.
<b>Risk Control (mitigation, risk treatment)</b>	Actions, measures, or conditions designed to change one or both of a Risk's characteristics (its Impact and/or its Probability). Risk Treatment includes the selection of treatment options, planning and implementation of activities, and monitoring and evaluation of effectiveness. For example, the use of materials with low combustibility or the isolation of smoking areas should reduce the Probability of fire, and the use of means of rapid detection and extinguishing of fires is aimed at reducing its Consequences.

term/abbreviation	definition of the term / explanation of the abbreviation
<b>Risk Assessment</b>	<p>The complete risk identification, analysis, and assessment process.</p> <p>Risk assessment is part of the risk management process and is carried out in order to prepare an informed decision regarding a risk on risk control and mitigation measures, taking into account cost/effect and based on the Risk priority.</p>
<b>Residual Risk</b>	<p>An assessment category that reflects expectations for changes in the Probability parameters or the degree of Impact of a particular Risk after Risk Treatment.</p> <p>It enables correlation of the cost of mitigation and the expected effect.</p>
<b>Risk priority (prioritization and ranking of risks)</b>	<p>The process of ranking and/or ordering information about risks by their priority levels in accordance with the risk assessment carried out.</p> <p>Prioritization is carried out in order to prioritize the allocation of resources for risk mitigation according to the degree of their criticality for the Group's goals.</p> <p>The ranking is based on the risk priority and determines the level of decision-making in risk management.</p>
<b>Risk Documentation</b>	<p>Systematic recording of basic information on a risk in agreed-upon formats.</p> <p>Risk documentation is carried out for many purposes, including, but not limited to, cross-functional information exchange and coordination, as well as for risk reporting purposes.</p> <p>Examples of documenting risk information: risk passport, risk register, project risk map, OIBDA risk factor analysis, etc.</p> <p>The Segezha Group's SCs and SUs do their best to document risks within their business processes based on the capabilities and the principle of reasonable sufficiency.</p> <p>Specific forms of risk documentation are provided for in the framework of the regulation of the relevant business processes.</p>
<b>Risk Portfolio</b>	<p>Aggregated information on the distribution of key documented risks among the Organizations of Segezha Group (and/or divisions, business units, enterprises, or structural units), business processes, types of activities, levels of decision-making, and/or other criteria, depending on the specific features of the activity and the implemented corporate practices and business processes for risk control.</p>
<b>Risk Areas</b>	<p>An area of focused and high-priority attention of management, risk issues or a group of risk factors for identification and targeted management in order to achieve the operational or strategic goals of Segezha Group.</p> <p>For example, in the context of the budget process, a list of areas for controlling and mitigating the risks of non-fulfillment of the OIBDA target—volume reduction risks, price risks, logistics risks, etc.—may be recommended.</p> <p>Another example of a risk area (strategic) is a threat to the raw material security of Segezha Group.</p>

term/abbreviation	definition of the term / explanation of the abbreviation
<b>Risk Group (grouping of risks)</b>	<p>Risks grouped by the same or similar signs and/or characteristics.</p> <p>Risk grouping is used in Segezha Group for classification, as well as for analysis for the purposes of documenting and/or disclosing and/or reporting risks.</p> <p>For example, financial risks, operational risks, external risks, internal risks, etc.</p> <p>The classification of risks in the Group should take the IMS into account.</p>

## 6. Main Provisions

6.1 The risk-based management of the Segezha Group's business is aimed at providing a reasonable assurance of achieving the agreed goals and maintaining the risk level of Segezha Group (the probability of materialization and the degree of potential impact) within the limits acceptable to the shareholders and the management.

6.2 Risk management is aimed at improving the efficiency of the companies and structural units of Segezha Group as a result of the integration of risk management with the processes of strategic planning, business planning, and management decision-making.

6.3 Segezha Group, in its business activities, adheres to the principles ***of a moderate business risk appetite*** and a responsible attitude to risk. When making business decisions, Segezha Group does its best to evaluate and correlate the expected return with the limit of the acceptable risk taken to generate this return. When targets are approved for the Group, risk appetite may be approved in the format of the values "acceptable," "target," and "aggressive" in relation to the planned indicators.

Segezha Group adheres to the principle of rejection of corruption in all forms and manifestations (the "zero tolerance" principle). The risk of involvement of Segezha Group in corrupt activities (corruption risk) is subject to mandatory monitoring and management, regardless of the probability of occurrence of a risk event and/or the degree of impact of the risk.

Work toward achieving the sustainable development goals in Segezha Group is inextricably linked to improvements in occupational safety, occupational health, and industrial and fire safety, as well as improvements in environmental protection and minimization of the Group's overall environmental impact. The Group may refrain from business activities in cases where the agreed-upon risk assessment would indicate a potential unacceptable negative impact, taking into account the agreed-upon goals of the Group's social responsibility.

6.4 In order to develop risk-based business management, risk management in Segezha Group is aligned with the goals, strategy, and internal and external conditions (context) of the business and the corporate culture of the Company and its SCs.

6.5 The Segezha Group's management does its best to ensure that risk management in the Company and its SCs is an integral part of the strategy, the setting of goals and objectives, corporate governance, leadership, teamwork and responsibility, and is not separated from them.

6.6 Risk management in Segezha Group is carried out in each company (SC) and in each part of its structure (SU).

6.7 The integration of risk management into the Group's management is a dynamic process that goes through iterations and accompanies the development and improvement of corporate governance, taking into account the needs and capabilities of SCs and SUs within the Group.

6.8 Each employee of Segezha Group is responsible for risk management to the best of his or her competence, knowledge, official authority, and available resources. Reporting a risk (risk factor) is the first step and an integral part of such a responsible attitude of each employee. Senior and line management shall cultivate a responsible attitude toward risks

among employees.

6.9 Within the framework of the integrated management system (IMS) and in order to build it, organizations and structural units of Segezha Group strive to coordinate their activities in relation to risks, taking into account the requirements of various (several) international standards of the ISO (International Standard Organization) standardization systems: optimize resources and integrate information flows and formats for risk monitoring, accounting, and reporting.

## **7. Risk-Based Management Components**

### **7.1 Organizational resources:**

- Employees and interested persons with competencies, skills, and knowledge who are united by common principles and corporate culture (risk culture) in relation to risks;
- Information systems and information management systems that enable the collection, accumulation, systematization, and analysis of data for the purpose of identifying, analyzing, and assessing risks;
- Financial and economic resources (CAPEX/OPEX) required to implement risk management measures;
- Organizational infrastructure: structural units, management and business processes, methods and tools for organization of work, internal regulation and allocation of authority within processes, performance assessment systems, and control and reporting systems.

The Segezha Group's management and governing bodies are responsible for the sufficient and timely allocation of resources for risk management, taking into account prioritization and guided by the principles of reasonableness and sufficiency.

### **7.2 Components of the risk management process:**

- Risk assessment (the full process of risk identification, analysis, and assessment, risk prioritization);
- Risk Treatment (selection and adoption of decisions regarding treatment options, planning and implementation of measures, monitoring and evaluation of the effectiveness of measures);
- Documentation of information on the Risk;
- Cross-functional information exchange and coordination of actions with regard to a risk;
- Preparation and provision of corporate reporting and disclosure of information on risks and risk-based management culture and practices;
- Accumulation of knowledge about the Segezha Group's risks, improvement of risk management practices, formation of best practices, and development of the risk culture.

The process components that ensure Risk Assessment and Risk Treatment are integrated into all main and auxiliary business processes of the SUs and SCs that are part of Segezha Group.

Documentation of information on a risk is preferably provided for within the framework of the main and auxiliary business processes in the Group, while taking into account the special features of a particular business process, the need and feasibility, and the availability of resources (including time) for documentation.

Cross-functional exchange of risk information can be formalized or informal, with the priority being to ensure that decision-making processes are provided with the best available information on risks.

Coordination of procedures for the preparation and provision of integrated corporate reporting and disclosure of information about the risks of Segezha Group (within the framework



of compliance with the requirements) shall be carried out by the ERM Unit.

Integrated corporate risk reporting consisting of the risk register of the level of control of the Board of Directors and a report on measures for developing the culture and improving the effectiveness of risk management shall be submitted to the Board of Directors for consideration at least twice a year in accordance with the annual work plan of the Board of Directors. Such reports shall be included in the work plan of the Board of Directors by June 30 and December 31 of each year.

7.3 Components of the risk management methodology:

- Risk accounting (documentation) formats;
- Risk management reporting formats;
- Methods of quantitative and qualitative Risk Assessment;
- Methods for prioritizing and ranking risks;
- Methods and formats for selecting risk treatment measures and procedures for controlling the measures.

The management and Risk Owners, with the participation of the ERM Unit and guided by the IMS principles, do their best to mutually converge methodological requirements in terms of risk management to optimize resources and coordinate management processes (identification, classification, assessment, prioritization, determination of materiality criteria, and escalation/de-escalation of risks between management levels, implementation of mitigation and control procedures, reporting) within the functional, main and auxiliary business processes of the SUs and SCs of Segezha Group, as well as corporate governance procedures.

7.4 Risk-based management participants:

- The Company's Board of Directors and the Audit Committee under the Company's Board of Directors;
- Executive bodies of the Company and subsidiary companies of Segezha Group;
- Managers and employees of business units and structural units who directly implement business processes and support processes and control procedures in the Company and the enterprises and companies of Segezha Group;
- Employees who conduct internal audits of the effectiveness of risk management and risk-based management culture and practices.

## **8. Risk-Based Management Roles, Rights, and Responsibilities**

8.1 The Company's Board of Directors (and Committees of the Board of Directors) shall establish the requirements for risk-based management of the organization's business in order to provide a reasonable guarantee of achieving the agreed goals of Segezha Group, improving the efficiency of the Group's activities and maintaining the level of risk within the limits acceptable to the shareholders and management. It shall:

- Define the principles and approaches to the organization of risk-based management in Segezha Group, i.e. approve this Risk-Based Management Policy of Segezha Group;
- At least twice a year, review reports on risks at the level of control of the Board of Directors and information on the functioning of risk management systems, on the culture and on the effectiveness of the Company's activities for achieving the goals of the organization, taking into account risk-based management (integrated corporate risk reporting);
- Review and approve the Group's strategy and budget, taking into account the Group's risks;
- Review the assessment results of the effectiveness of risk management (including by the Internal Audit Service).

8.2 The senior management (the President, the Vice Presidents of departments, the Vice-Presidents of divisions and Managers directly reporting to the President) shall ensure the integration of risk management in all activities under their control to achieve the Group's goals

and demonstrate leadership and responsibility for risk management. They shall:

- allocate the necessary resources and establish authority, responsibility and accountability at the appropriate levels of the organization (Clause 7.1. of this Policy);
- implement the necessary components of the risk management process in the business processes they control and supervise (Clause 7.2. of this Policy);
- when regulating work within their area of responsibility, ensure that there are sections, procedures, and activities that contain a plan of and/or procedure for actions in terms of risk management;
- ensure cross-functional interaction and exchange of the best available information on the Group's risks for the adoption of informed decisions about the goals of Segezha Group, taking into account the interdependencies and interrelationship of risks.

The top management of the Group shall declare its commitment, develop the organization's risk-based management methods, and develop the risk culture in Segezha Group.

8.3 Employees of Segezha Group are the bearers of the corporate risk culture. Employees of all SUs and SCs that are part of the Group shall:

- be aware of the risks they face in their work;
- inform the top management or competent services and SUs about the risks and threats they face in their work;
- be responsible for their own industrial safety and the safety of the people working with them and take all available measures to reduce labor protection risks;
- respect and be guided in their work by the goals of creating and protecting the value of Segezha Group;
- show zero tolerance for corruption risks.

8.4 The Risk Committee of Segezha Group a permanent operational cross-functional collegial advisory body which is a working platform for interaction between SUs and SCs on matters of communication about risks and their assessment and coordination of actions for controlling risks.

The status, procedure for approving the membership, competence, and functions of the Risk Committee, as well as the procedure for organizing work and making decisions necessary for the organization of risk-based management in Segezha Group, shall be determined subject to the organizational structure of Segezha Group and the implemented corporate practices and business processes.

Taking into account the specific features of the activities of enterprises and units within Segezha Group and subject to customary business practices, implemented corporate practices, and organizational, managerial, control, and business processes of the Group, the Risk Committee of Segezha Group may be organized in Segezha Group Management Company LLC.

8.5 Risk owners are officers who are accountable and have the authority to mitigate (treat) risks by virtue of the operational decisions made by the top management and/or by virtue of the relevant guidelines and regulations of business processes. They shall:

- perform continuous Risk Assessment and Risk Treatment within the framework of their powers, competencies, and functional (professional) expertise;
- implement risk-based management within their functional business processes and in accordance with the provisions of this Policy;
- be responsible for proper documentation of risk information within their functional business processes and in accordance with the requirements of this Policy;
- submit information on risks to the Risk Committee in accordance with the rules of its work;
- as part of the ERM process procedures, provide data on a regular basis for documentation, cross-functional coordination, preparation of corporate reporting, and knowledge management in Segezha Group.

Risk owners shall be responsible for timely communications (requests) to the top management and/or the Segezha Group's Risk Committee when their competencies or resources are insufficient for effective risk treatment and it is necessary to make appropriate and/or additional management decisions.

8.6 The ERM Unit shall ensure the implementation of integration procedures and processes within the framework of risk-based management in Segezha Group. It shall:

- provide methodological support to SUs and SCs in terms of selecting Risk Assessment methods and Risk Treatment measures, as well as developing optimal formats for documenting risk information in order to integrate it into business processes and regulations in functional and business areas;
- ensure the necessary procedures for the preparation and provision of integrated corporate reporting and disclosure of information about the risks of Segezha Group (within the framework of compliance with the requirements);
- implement the ERM Process (in accordance with the approved regulations);
- ensure cross-functional information exchange and risk coordination at the Group level;
- ensure integration within the framework of the IMS in risk-related areas in accordance with the requirements of various standards (methodology, reporting, etc.);
- manage insurance activities in accordance with the Insurance Standard of Segezha Group;
- monitor the best practices of risk-based management of the organization, build a knowledge base on risk management in Segezha Group, provide training, and improve the competencies of all employees of the Group in relation to risk management;
- interact with control and audit bodies regarding the disclosure of information on the risk-based management of Segezha Group and the ERM process;
- ensure the work processes of the Risk Committee and participate in its work;
- promote the introduction and development of the risk culture in Segezha Group.

With the exception of the procedures for organizing insurance coverage in Segezha Group, the ERM Unit shall not implement measures aimed at Risk Treatment due to its lack of the appropriate resources and authority.

In terms of Risk Assessment, the ERM Unit shall provide methodological support to Risk Owners, including cross-functional calibration procedures and exchange and assessment of risk information. However, the ultimate responsibility for risk assessment and prioritization shall lie with the Risk Owners, who have more complete competence within their authority and functional (professional) expertise.

8.7 The Internal Audit Service shall evaluate the reliability and effectiveness of risk management and provide recommendations for improving the practices and methods used. Assessment activities shall be included in the work plan of the Internal Audit Service on a regular basis. The assessment and proposed recommendations shall take into account the culture and maturity of corporate practices in the Group; the scale, specific features, and business needs of the enterprises; best practices and applicable laws and regulations. The Internal Audit Service shall have access to all documented risk information provided for in this Policy.

8.8 Risk management shall be monitored within the framework of corporate procedures, as well as through supervision by corporate bodies, in order to understand the risks faced by the Group in achieving its goals and to ensure the implementation and effective functioning of management systems in relation to high-priority and significant risks. The Group shall do its best to conduct internal and external assessments of the effectiveness of risk management on a regular basis.

## **9. Risk Prioritization and Ranking Principles**

9.1 Risk management in Segezha Group and the companies that are part of the Group is organized on the basis of the corporate governance principles and takes into account the Group's hierarchical management structure.

The risks of controlled entities within the Group shall be accounted for in the risk portfolio of Segezha Group using a combined approach, in which:

- the risks of each of the Group's enterprises which affect the sustainability and efficiency of the enterprise's operations and goals form the enterprise's risk profile;
- standard (industry-specific) risks of the Group's enterprises can be further aggregated and assessed at the Segezha Group's level within the framework of risk control in the functional area (e.g. financial risks, occupational and industrial safety risks, cyber risks, compliance risks, etc.);
- risks of the budget, strategy, and investment program formed on a consolidated basis for Segezha Group (risks of achieving agreed-upon targets) can be aggregated with respect to their potential impact on the achievement of the agreed-upon goals or indicators (or KPIs) of the budget, strategy and investment program;

individual (unique) risks of the Group's enterprises, standard (industry-specific or functional) risks of the Group and risks of target indicators can be aggregated using approaches for prioritization, escalation and de-escalation, as well as risk ranking.

9.2 As part of risk-based management, the Segezha Group's management shall be guided by the principles of priority allocation of resources for the most significant risks, as well as escalation ("raising to a higher level") of the control and mitigation of those risks that require a cross-functional approach or cannot be adequately addressed at a lower level of management due to the lack of sufficient resources or authority. If the risk assessment level (Probability and Impact) is reduced, the mechanism of de-escalation ("taking down to a lower level") of control and mitigation of risk to a lower level of management can be applied.

9.3 Prioritization solves the problem of identifying the most critical risks of Segezha Group for the priority allocation of resources for their control and mitigation.

9.4 Risk ranking is aimed at determining the most appropriate levels of decision-making in risk management. The scale of criteria for ranking risks is contained in Appendix 1.

9.5 Ranking and prioritization shall coincide to a significant degree and are based on two basic risk assessment criteria—Probability and Consequences. At the same time, it is understood that there may be more criteria for determining the significance of risks or the immediate Consequences of a risk event may not necessarily be expressed in monetary terms.

9.6 Ranking and prioritization of risks and/or risk areas within the framework of risk-based management of Segezha Group can be carried out in the context of current management in an operational manner based on the exchange of information and open communications.

## **10. Final Provisions**

10.1 If the Company acquires public status, this Policy shall remain in effect.

## Scale of Criteria for Ranking Risks in Segezha Group.

Уровень управления	Руководитель Дочернего Общества ГК «Сегежа»	Руководитель Дивизиона или Структурного подразделения УК	Комитет по рискам Группы «Сегежа»	Правление / CEO	СД ГК «Сегежа» и его Комитеты
Критерии оценки риска					
Оценка потенциального ущерба, который можно выразить в финансовых показателях	до 50 млн. руб.	от 50 млн. руб. до 150 млн. руб.	от 150 млн. руб. до 400 млн. руб.	от 400 млн. руб. до 1 млрд. руб.	от 1 млрд. руб.
Оценка потенциального ущерба жизни или здоровью людей	Травмы без потери рабочего времени.		Анализ рисков и динамики показателей производственного травматизма.	Все случаи травматизма на производстве и анализ статистики.	Агрегированные показатели в рамках контроля метрик HSE.
Оценка потенциального ущерба репутации ГК «Сегежа»	не применимо	Негативный информационный фон с участием социальных медиа и изданий регионального уровня без необходимости дополнительных расходов.	не применимо	Негативный информационный фон с вовлечением изданий федерального уровня (tear1) и/или необходимость дополнительных расходов.	Агрегированные показатели, последствия, ведущие к прекращению деятельности, ущерб репутации Группы, ответственности директоров и должностных лиц - в рамках плановых отчетов о работе.
Комплаенс и потенциальный ущерб от несоблюдения внутренних политик или законодательства (внешний)	Риски нарушения внутренних регламентов.		Анализ рисков нарушения требований (комплаенс-рисков) и в рамках кросс-функционального взаимодействия.	Все риски несоблюдения корпоративных политик (внутренний) или законодательства (внешний).	