



APPROVED  
by Resolution of the Board of Directors  
of PJSC PhosAgro dd. December 21, 2021  
(Minutes of the Meeting of the Board of Directors  
dd. December 21, 2021, unnumbered)

## Information Security POLICY of PJSC PhosAgro

This internal document of PJSC PhosAgro defines the information security policy (hereinafter – IS) of PJSC PhosAgro and organizations belonging to the same corporate group (hereinafter collectively – the Company).

In order to maintain sustainable development, achieve industry leadership and carry out continuous activity of the Company, a high priority is established for information security.

In order to fulfill these objectives, the Company assumes the obligations to comply with the requirements of the legislation in the field of IS, as well as to prevent unauthorized access, use, disclosure, distortion, modification, research, recording or destruction of information that is valuable to the state, society, the Company itself, its shareholders (members), employees, counterparties and other interested parties, protecting such information, regardless of the methods of its processing.

The organization and operation of the Company's information security management system (hereinafter – ISMS) is based on the following principles:

– **Business orientation.** The ISMS complies with the objectives and values of the business, protects its interests, have no adverse effect for the Company operation and the results of its activities.

– **Economic expediency.** The costs of ISMS maintaining and developing do not exceed the amount of damage from disclosure, loss, destruction, distortion and unauthorized access to the information.

– **Independence.** The organizational and functional independence of the IS maintenance processes is ensured within the framework of the Company's structure.

– **Legal validity.** The ISMS has been created and is being improved in accordance with the requirements of applicable legislation.

– **Preclusiveness.** Development of ISMS elements is carried out in parallel with the development of the protected object.

– **Comprehensiveness.** The ISMS comprehensiveness is achieved by the coordinated use of methods and means of protection to the maximum extent possible, blocking the channels for the implementation of IS threats, as well as by regulating the procedures of internal activities and analytics developing.

– **Openness.** ISMS development and improvement is accompanied by cooperation within the Company, as well as the cooperation of the Company and its officials with external stakeholders.

– **Training and Development.** The company focuses on training and professional development of its employees in the IS field and the creation of appropriate conditions thereto.

– **Control.** The ISMS includes procedures for control of the compliance with the established IS requirements, ensuring the possibility and readiness to carry out an independent assessment of both the information resources and systems of the Company and the ISMS itself.

– **Improvement.** The ISMS is developing in accordance with organizational and structural changes of the Company, changes in the level of external and internal IS threats, changes in the legislation and the evolving practice of law enforcement; at the same time, the Company organizes its activities in the field of information protection, taking into account the positive experience of the world's best practices in this area and strives to comply with such practices.

– **Continuity.** IS provision is a results-oriented process that assumes continuity in the application of adequate protection measures at all stages of the life cycle of the Company's information resources.

The company assumes the responsibility for the implementation of this Policy, bringing it to the attention of



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employees and other interested parties, as well as for the proper provision of support and ISMS development.

This Policy is the basis for ensuring information security of the Company. The implementation of this Policy is governed by local regulatory documents of the Company's organizations in the relevant areas of information security and decisions of the authorized management bodies of the Company's organizations, made, inter alia, taking into account the specifics of the activities of organizations.

Amending and/or expanding this Policy and approval of the new version of Policy are carried out by PJSC PhosAgro Board of Directors.