



Nostrum Oil & Gas Group Equality and Diversity Policy

Nostrum Oil & Gas PLC and its subsidiaries (collectively, the "Group" or "Nostrum") is committed to eliminating discrimination and encouraging equality and diversity in all of our business activities, including the provision of employment. This commitment to equality and diversity underpins all our policies and practices. Nostrum seeks to maintain a positive working environment in which we respect each other, our employees and suppliers.

This policy applies to all who work for Nostrum, including directors, together with the managerial, supervisory and administrative bodies of all entities within the Group. This policy applies equally to the treatment of our supply chain, applicants and visitors by our staff and the treatment of our staff by these third parties.

The objective of this policy is to promote equality of opportunity and to ensure that no individual suffers unlawful discrimination, directly or indirectly, on the grounds of race, colour, ethnicity, religion, sex, gender identity or expression, gender reassignment, national origin, age, marital status, disability or sexual orientation.

Nostrum will avoid unlawful discrimination in all aspects of employment including recruitment, job assignment, promotion, training and development, transfer opportunities, conditions of service, pay and benefits, health and safety, grievance and disciplinary procedures and termination of employment, including redundancy.

The main terms of the policy are as follows:

- All recruitment advertising and publicity aims to encourage applications from any individual who has appropriate qualifications and/or experience.
- It is against Nostrum's policy to offer discriminatory conditions of employment.
- All promotion is strictly on the basis of ability to do the job. No decision to promote will be made on a discriminatory basis.
- Nostrum considers requests for the creation of part-time work or job-sharing opportunities wherever appropriate and practicable and it ensures that part-time employees receive fair treatment.



- Demands of religion (e.g. prayer time and religious holidays), culture (e.g. traditional dress) and special dietary needs are accommodated wherever possible.
- Nostrum will take reasonable steps to assist employees with domestic responsibilities (e.g. young children or dependent elderly relatives).

Nostrum commits to taking the following steps to implement and ensure adherence to this policy:

- The policy is displayed on the Group Intranet and a copy is distributed to all employees, including directors and members of senior management. This policy is also available in Russian.
- Line managers are responsible for implementing this policy within their areas and ensuring that any problems are dealt with promptly. Failure to do so will be considered a failure to carry out their managerial duties.
- If any person to whom this policy applies feels that they have suffered discrimination then, if possible, they should approach the relevant individual(s) to discuss any problems directly with them and try to resolve the matter informally. However, it is recognised this is not always possible, in which case anyone to whom this policy applies is encouraged to contact the head of Human Resources for further information regarding how to raise a grievance in relation to such matter.
- Disciplinary action, potentially including dismissal from employment, will be taken against any employee who is found to be in breach of this policy. Serious breaches will be treated as gross misconduct, as will bullying, sexual or racial harassment.
- We will make Nostrum's supply chain aware of this policy and our expectations around equality and diversity.

Overall responsibility for this policy rests with Nostrum Oil & Gas PLC's Board of Directors and Senior Management Team. In order to support our equality and diversity aims we will be open and transparent and commit to reporting our performance and application of this policy. A copy of this policy will be made available upon request to any interested party.

If you have any questions about this policy, please contact Human Resources.



This policy does not form part of any Contract of Employment.

For and signed on behalf of Nostrum Oil & Gas PLC

Signed:

Kai-Uwe Kessel
Chief Executive Officer

Date: 7 December 2017