

**PJSC ALROSA**  
**RULES FOR NON-DISCRIMINATORY ACCESS OF SUPPLIERS TO THE**  
**PROCUREMENT OF GOODS, WORKS, AND SERVICES**

## **1. Main provisions**

- 1.1. These Rules for Non-Discriminatory Access of Suppliers to the Procurement of Goods, Works, and Services (hereinafter referred to as the Rules) have been developed in accordance with subparagraph “g” of paragraph 2 of the National Competition Development Plan of the Russian Federation for 2018-2020, approved by the Decree of the President of the Russian Federation on December 21, 2017 No. 618 “On the main directions of state policy for the development of competition”, by the Federal Law No. 223-FZ “On the Procurement of Goods, Works, Services by Certain Types of Legal Entities” on July 18, 2011, and the Procurement Regulations of the Company, approved by the Supervisory Board of PJSC ALROSA (hereinafter referred to as ALROSA, the Customer) on September 29, 2016 (rec. A01/247-IIP-HC) with amendments approved by the decision of the Supervisory Board of the Company on June 16, 2017 (rec. №A01/258-IIP-HC) and March 21, 2018 (rec. №A01/270-IIP-HC).
- 1.2. The Rules define the general principles and rules for ensuring non-discriminatory access of suppliers to the ALROSA procurement procedures.
- 1.3. Non-discriminatory access of suppliers to ALROSA competitive procurement procedures provides for ensuring equal conditions for the realization of the rights of potential suppliers regardless of their organizational and legal form.

## **2. Objectives and Principles of the Procurement Procedures**

- 2.1. ALROSA declares an open competitive system for conducting procurement procedures in accordance with ALROSA Procurement Regulations, approved by the Supervisory Board on September 29, 2016 (rec. No. A01/247- IIP-HC), based on the following objectives and principles:
  - expanding opportunities for the participation of legal entities and individuals, including individual entrepreneurs, in the procurement of products for the needs of the Customer, and encouraging such participation;
  - fostering fair competition;
  - preventing corruption and other abuses in the organization of procurement activities;
  - ensuring informational transparency and transparency of procurement activities;
  - ensuring equality, fairness, absence of discrimination, and unreasonable restrictions on competition concerning participants;
  - establishing measurable requirements for procurement participants.
- 2.2. ALROSA ensures a fair and equal approach to participants in procurement procedures by establishing uniform requirements to prevent unreasonable restrictions on competition regarding procurement participants.
- 2.3. All participants are granted equal rights to present their proposals.
- 2.4. ALROSA ensures that procurement participants’ applications are reviewed and evaluated fairly, using the requirements, criteria, and evaluation procedures established in the procurement documentation.
- 2.5. The procurement body makes decisions regarding the selection of procurement winners during the procurement procedures. Members of procurement bodies are obliged to strictly adhere to the regulations and rules of procurement procedures established by the legislation of the Russian Federation, ALROSA Procurement Regulations, and other internal documents regulating procurement activities.

## **3. Information transparency of Procurement Procedures**

- 3.1. Informing suppliers about ALROSA’s product needs is achieved through the official publication of the Procurement Plan and the Innovative Product Procurement Plan in the unified information system in the field of procurement.

- 3.2. The information about ALROSA's procurement activities is posted on ALROSA's official website (Procurement section) to inform the public and participants about procurement procedures (including potential ones).
- 3.3. ALROSA's priority procurement methods includes open competitive procedures and competitive electronic procurement.
- 3.4. Prior to officially announcing procurement procedure, ALROSA is entitled to:
  - post announcements about procurement in certain areas of its activities,
  - research the market and hold negotiations with potential procurement participants,
  - request prices and other contract terms to calculate initial procurement prices and clarify existing technical proposals in the market,
  - send invitations to participate in announced and planned procurements,
  - hold seminars, meetings, and training sessions with potential procurement participants,
  - conduct product procurements testing,
  - get acquainted with the relevant project implementation experience.
- 3.5. ALROSA may arrange a conference to explain the parameters of the upcoming procurement.

#### **4. Suppliers and Contractors Engagement**

- 4.1. Any person interested in participating in ALROSA's procurement procedures has the right to request clarification of the procurement documentation. The procedure for submitting clarification requests is outlined in the procurement documentation.
- 4.2. ALROSA engages with SMEs, including those in ALROSA's Partnership Program, by staging events that aim to increase procurement efficiency and simplify access to ALROSA procurements.

#### **5. Establishment of Requirements and Evaluation Criteria**

- 5.1. Requirements are formed based on ALROSA's needs, focusing on the procurement activity's objectives and aimed at the competitive selection of a supplier who can properly fulfill the contract resulting from the procurement procedure.
- 5.2. ALROSA's Procurement Regulations prohibit the establishment of requirements for procurement participants that have no established procedure for confirming their compliance.
- 5.3. The rules for forming requirements for inclusion in the procurement documentation, as well as the criteria and procedures for reviewing and evaluating in accordance with such requirements, are defined by ALROSA's internal regulatory document.
- 5.4. If the procurement participant fails to meet the exhaustive list of requirements, he will be excluded from the procurement procedure.
- 5.5. All procurement participants, including each member of a collective participant and the sole supplier must comply with the requirements set forth in ALROSA's Procurement Regulations.

#### **6. Grievance procedure**

- 6.1. ALROSA's Procurement Regulations provide for the right of procurement participants to appeal against the conditions of the procurement documentation, the actions (inaction) of the Customer, the procurement organizer, and the procurement authority, if such actions (inaction) violate the rights and legitimate interests of the participant related to their participation.
- 6.2. Complaints may be submitted to ALROSA's Procurement Complaint Review Commission.
- 6.3. The procedure for submitting and reviewing complaints is posted on ALROSA's official website.