

Compliance

The Company has created a Compliance Service. The main task of the division is to ensure compliance with mandatory regulatory requirements and international practices on issues of combating corruption, compliance with ethics and the formation of the Company's internal corporate culture.

The Company has the following internal documents*:

- › Anti-Corruption Policy;
- › Whistleblowing Policy;
- › Conflict of Interest Policy;
- › Code of Business Ethics;
- › Corporate Governance Code.

Last year, in order to improve the compliance culture, 5 "Ethics of Conduct" training competitions were held on knowledge of the Company's anti-corruption, anti-fraud, conflict of interest regulations, etc., where more than **1,200 employees** studied internal documents in the form of a specially developed online game (gamification) and subsequently tested and determined the winners.

On a regular basis, all Company employees receive information on the activity of the Compliance Service, with a description of the results of consideration of complaints and appeals and the measures taken against employees who have committed violations of the requirements of internal documents.

No cases of corruption were identified in 2021.

Anti-corruption at the Company is based on the following main principles:

- › the legality of the Company's operations;
- › the public and openness of the Company's operations;
- › anti-corruption promotion among employees, partners and clients;
- › cooperation in the area of anti-corruption activity with the state authorities, as well as the Company's partners and clients;
- › mandatory performance of official audits of violations of anti-corruption laws and the Company's internal policies.

In 2021, the Board of Directors approved a Report prepared based on the results of the analysis of corruption risks in procurement and human resources management.

Reporting mechanisms for unethical or illegal conduct are governed by the Whistle-Blowing/Reporting Policy, under which the Company guarantees full confidentiality to employees, business partners and other interested parties who have reported serious problems at the Company, as well as the absence of harassment and/or discrimination.

The Company's internal and corporate websites contain contacts of the Hotline and the Compliance Service, where any facts of labor, corruption and other types of offenses can be reported.

In 2021, 130 reports on the following topics were considered:

- › non-performance of contractual obligations;
- › unfair wages;
- › unequal employment and working conditions;
- › violations of procedures, abuse;
- › Procurement violations.