

Anti-Corruption Policy

1. Introduction

The Anti-Corruption Policy of JSC "Selectel" and its subsidiaries (hereinafter referred to as the Policy or the Anti-Corruption Policy) specifies the basic principles and requirements for compliance of JSC "Selectel" and its subsidiaries (hereinafter referred to as the Group), Management and Workers of the Group with the provisions of the Anti-Corruption Legislation.

This Policy sets out the following objectives for the Group:

- to ensure that the Group's activities comply with the requirements of the Anti-Corruption Legislation and high standards of ethical business conduct;
- to implement Anti-Corruption Procedures for compliance by Employees across all Group companies;
- to minimize the risk of involvement of the Group and Employees, irrespective of their position, in Corrupt Practices;
- to ensure a uniform understanding of the Group's policy among Counterparties, Employees and other persons, aimed at rejecting Corruption in any form or manifestation;
- to summarize and explain the principal requirements of the Anti-Corruption Legislation applicable to the Group and its Employees;
- to set the obligation of Employees to know and comply with the principles and requirements of this Policy and take measures to prevent Corruption.

The policy is developed under the current principles and norms of international law, provisions of international treaties, legislation of the Russian Federation, as well as the Group's internal regulations.

All Employees shall be guided by this Policy and shall strictly comply with its principles and requirements.

The objective of the Group's Senior Management within the framework of this Policy is to establish the "tone at the top" by supporting an ethical culture and rejecting corrupt behavior through their personal example.

2. Principles

Core principles of our interaction

Key principles of the Anti-Corruption Policy are as follows:

Principle of the "tone at the top"

The Group's Management sets an ethical standard of zero tolerance for any form or manifestation of Corruption at all levels, setting an example by its behavior and ensuring that all Employees and Counterparties are familiar with the Anti-Corruption Policy.

Principle of "zero tolerance" for Corruption

The Group adheres to the principle of nonacceptance of Corruption in any form or manifestation ("zero tolerance" principle) in its financial and business activities, including the interaction with Counterparties, Government Officials and Employees of State-Owned Companies, its own Employees, and other persons.

Principle of periodic assessment, risk minimization and proportionality of Anti-Corruption Procedures to the risk of Corruption

The Group regularly carries out measures to identify and subsequently minimize corruption risks, focusing on risks specific to its operations, regions of operation, and potentially vulnerable business processes. The Group develops and implements procedures for Countering Corruption that are appropriate to the level and nature of the risks revealed.

Principle of regular monitoring of effectiveness and control of compliance with procedures

The Group monitors the effectiveness of the implemented procedures to prevent Corruption, controls compliance with them, and improves them if required.

Principle of legality in interaction with Counterparties

The Group is committed to cooperate only with those Counterparties that are guided by the principles of legality in their activities, are willing to comply with the requirements of this Policy and the Anti-Corruption Legislation by including Anti-Corruption Clauses in their contracts, and promote ethical business conduct and prevention of Corruption.

Principle of informing and training Employees

The Group takes all possible measures to familiarize Employees with the provisions of this Policy and the basic requirements of the Anti-Corruption Legislation. It also welcomes and encourages compliance with the principles and requirements of this Policy by all Employees. The Group promotes an anti-corruption culture by systematically training Employees to maintain their awareness of anti-corruption issues and encourages the involvement and active participation of Employees in the implementation and improvement of the Anti-Corruption Policy.

Principle of non-retaliation

No sanctions shall be imposed on an Employee for:

- refusal to give a Bribe, to make or receive a Commercial Bribe, or to mediate in bribery or Commercial Bribery, including if such refusal results in the Group incurring losses, lost profits, or failure to obtain commercial and/or competitive advantages;
- good faith reporting of suspected violations, Corruption, other malpractices, or inadequate effectiveness of current control procedures.

Principle of impartiality for exercising internal investigations

All incoming requests and reasonable suspicions of such offenses are to be thoroughly and impartially investigated under the approved internal procedures. The Group shall ensure an impartial and thorough investigation of any activity contrary to this Policy.

3. Areas of the Anti-Corruption Policy

Areas of work on compliance with the Anti-Corruption Policy

This Policy is implemented in the following areas of the Group's activities:

3.1 Review of internal regulations

Anti-corruption review of internal documents

Key internal regulations developed by the Group are subject to mandatory anti-corruption review to identify corruption factors (provisions that contribute to the creation of conditions for corruption) and eliminate them.

3.2 Conflict of interest

Measures to prevent and minimize Conflicts of Interest

The Group develops and implements procedures aimed at preventing and minimizing the risks associated with Conflicts of Interest and promptly takes measures to resolve arising Conflicts of Interest.

To minimize the risk of a Conflict of Interest, the Group companies have adopted a procedure for declaration of a Conflict of Interest by Employees, whereby Employees whose positions are associated with increased corruption risks fill out a Conflict of Interest declaration:

- when hiring, when moving to a new position, in case of a Conflict of Interest;
- during annual update of the specified information on Employees;
- within the implementation of procurement and sales tasks when conducting verification and approval of Counterparties.

When declaring a Conflict of Interest, the Employee shall disclose the existence (absence) and nature of the relations with Government Officials, State-Owned Company Employees, or Related Parties.

When performing their job duties, each Employee shall be guided by the interests of the Group and shall avoid situations or circumstances in which their private interests would be contrary to the interests of the Group.

When an Employee is in doubt as to whether a Conflict of Interest exists in a particular situation, they shall seek advice from the Compliance Officer before engaging in the transaction or activities about which the Employee is in doubt.

If a Conflict of Interest arises, the employee shall notify Management and the Compliance Officer in a timely manner. The Employee may also report the arising Conflict of Interest to the Hotline.

3.3 Gifts and Hospitality Expenses

Donation and acceptance of Gifts in business practice

Gifts and Hospitality Expenses are considered an inherent part of conducting business and are a common business practice.

Gifts and Hospitality Expenses shall always be appropriate to the nature of the relations with the person to whom they are given, shall be directly related to the Group's business objectives, shall not exceed the bounds of business courtesy or customary practice, and shall not be so frequent or excessive as to raise doubts regarding their propriety.

Matters related to the donation and acceptance of Gifts, as well as the execution of Hospitality Expenses, are addressed in a separate local regulation "Policy on Gifts and Business Hospitality".

3.3.1 General requirements concerning acceptance and donation of Gifts

Under the Group's Code of Corporate Ethics and Business Conduct (hereinafter referred to as the Code of Ethics), Gifts, including those in the form of services, shall not put the receiving party in a state of dependence.

Employees may accept and donate Gifts from third parties if they meet the following criteria:

- they comply with the requirements of applicable Anti-Corruption Legislation and the Group's internal regulations in terms of value, proportionality, and feasibility;
- they do not impugn the recipient's ability to make objective and fair business decisions;
- it is possible to verify or confirm their value;
- they are not systematic;
- they do not create reputational or other risks for the Group in case of disclosure of information on Gifts or Hospitality Expenses.

Gifts that question the recipient's ability to make unbiased and fair business decisions shall not be donated or accepted at any time, regardless of the adoption of a major business decision within the Group that depends on the donor or recipient of the Gift or Hospitality Expenses.

Regardless of the reason and nature of the business relations with the Counterparty or other third party, the following types of Gifts shall not be donated or accepted:

- luxury goods (mobile phones, watches, various devices, cars, etc.);
- monetary funds, cash or non-cash in any currency, as well as their equivalents, securities (stock options, other securities and monetary instruments);
- precious metals;
- gift certificates, gift cards;
- entrance tickets for cultural events (theatre productions, concerts, sports and club events, etc.);
- discount cards for purchasing goods or services;
- memberships for physical fitness facilities;
- various benefits in transactions (interest-free or soft loans, individual discounts on goods, etc.);
- payment for hotel accommodation, recreation in health resorts, preventive clinics, vacation houses, tourist trips;
- payment of medical and educational expenses;
- free services (insurance, education, repair work, etc.);

- items that do not belong to the group of souvenir products (household or business appliances, furniture, vehicles, etc.).

An employee who is offered Gifts or other remuneration, either directly or indirectly, during the performance of their professional (job) duties, which may influence the decisions taken by them, shall refuse them and immediately notify their line manager and the Compliance Officer of the offer of such Gifts (remuneration).

The Group provides for mandatory written (electronic) approval of all Gifts given by Employees on behalf of the Group companies to Counterparties and other third parties by their line managers. On behalf of the Group companies, it is not customary to donate Gifts with a value equal to or exceeding 3,000 rubles (or its equivalent in another currency). In individual cases, Gifts of greater value may be approved by the Business Development Department and the Compliance Officer in writing (electronically).

The cost of Gifts received by Employees and (or) Related Parties may not exceed 3,000 rubles (or its equivalent in another currency). Should the Employee receive a gift of a higher value (or a total value exceeding 3,000 rubles) or should there be any doubt as to the possible value of the Gift, the Employee shall inform the Compliance Officer and their line manager within three (3) business days from the date of receipt of the Gift. The Compliance Officer shall be notified under the Group's procedures. The message shall include description of the Gift and the information stipulating from whom the Gift was received, if the donor is known. The Employee shall follow the instructions received from the Compliance Officer to mitigate the risk of corruption, including returning the Gift to the donor.

If there is any question as to the acceptability of a Gift or other questions regarding the handling of Gifts, the Employee shall consult the Compliance Officer for clarification.

3.3.2 General requirements for Hospitality Expenses

Under the Group's Code of Ethics and this Policy, Hospitality Expenses may be incurred for developing business relations with Counterparties and may include official events, meetings, and receptions.

Employees may organize events (including field events) for their Counterparties and participate in events organized by Counterparties, provided that such events comply with the following rules and restrictions:

- events have a legitimate reasonable business purpose;
- all expenses are subject to accurate and detailed accounting and reporting and shall be supported by primary documents.

Employees shall not make or accept an invitation to an event provided that the cost of such an event may affect the impartiality or appropriateness of any business decision made or being made by the organizer or invitee, or may create such an impression.

The Group provides for mandatory written (electronic) agreement of all Hospitality expenses incurred by Employees on behalf of the Group companies in relation to Counterparties and other third parties with their line managers. When inviting the Counterparty or if the Employee receives an offer from the Counterparty to pay the expenses for participation in the event in the amount exceeding 3,000 rubles per invitee,

the possibility of accepting such an offer shall be previously agreed upon by the Employee with their line manager and the Compliance Officer in writing (electronically).

Should there be any doubt as to the acceptability of Hospitality Expenses or other issues regarding how Hospitality Expenses are incurred, the Employee shall seek clarification from the Compliance Officer.

Group Companies do not allocate funds to Counterparties and representatives of Counterparties to independently pay for expenses related to the events organized by them.

The Group prohibits expenses related to business meetings and events to be incurred at the personal expense of employees and subsequently reimbursed as Hospitality Expenses without prior approval of the line manager.

3.4 Verification of Counterparties

Verification of Counterparties to ensure compliance with the Anti-Corruption Policy

The Group shall refrain from interacting with Counterparties if such interaction leads to a violation of the principles and requirements of this Policy or Anti-Corruption Legislation.

The Group makes reasonable efforts to minimize the risk of business relations with Counterparties that may be involved in Corruption activities. For this purpose, a comprehensive inspection of the Counterparty (regardless of its legal form) shall be conducted before any business interaction. The Group shall not enter into contractual relations with a Counterparty that has not passed such verification.

The purpose of the inspection is to confirm that a Counterparty meets the following criteria:

- it has a strong goodwill and relevant qualifications;
- there is a justified reason for entering into business relations with the Counterparty;
- the terms of business cooperation are commercially reasonable and correspond to the level and type of goods (services, works) provided by the Counterparty;
- there are no indications of improper relations of the Counterparty with Government Officials or Employees of State-Owned Companies;
- there is no evidence of a Conflict of Interest;
- it complies with the Anti-Corruption Legislation and undertakes to comply with the requirements of this Policy by signing an Anti-Corruption Clause when entering into a contract with a Group company.

The results of the conducted security check of the Counterparty shall be recorded in the form of a report prepared by the Security Department. The specified verification report shall be attached to each contract entered into.

When making a transaction with a Counterparty, regardless of its amount, the contract shall be authorized by the Security Department and the Compliance Officer.

When entering into business relations with Counterparties, the Group shall follow the rule that payments to Counterparties are to be made to bank accounts belonging to these Counterparties. Any financial transactions with Counterparties shall be reasonable and transparent.

The Group maintains an official register of unreliable Counterparties to eliminate the risks of conducting business with unreliable Counterparties. Counterparties who have not passed a security check, as well as those who have demonstrated unethical behavior or other violations of applicable laws, shall be included in the specified register. The register of unreliable providers shall be reviewed and updated at least once every six months.

To fulfill the principles and requirements stipulated by the Policy, the Group shall include Anti-Corruption Clauses in contracts with Counterparties and reserves the right to terminate contracts with Counterparties in case of detection of Corrupt Practices pursued by the Counterparty.

3.5 Interaction with Government Officials and Employees of State-Owned Companies

How to interact with Government Officials, Employees of State-Owned Companies and Related Parties

The Group's interactions with Government Officials, Employees of State-Owned Companies and Related Parties shall be carried out under the procedure set out in the local regulation "Procedure for Interaction with Government Agencies, Officials and Representatives of State-Owned Companies".

The Group's interactions with Government Officials, Employees of State-Owned Companies and Affiliated Persons shall not go beyond the official duties of these persons and shall only be conducted in an official form (e-mail, registered letters). The Group prohibits the payment of any expenses for (or for the benefit of) Government Officials, Employees of State-Owned Companies and Related Parties and the provision of any other benefit to them at the expense of the Group companies.

Gifts to Government Officials, Employees of State-Owned Companies and Related Parties, as well as Hospitality Expenses provided to them, shall not exceed 3,000 rubles under any circumstances.

Payments to accelerate formal procedures constitute a Bribe and are prohibited in the Group. Payments to accelerate formal procedures do not include formal administrative fees and payments to accelerate the provision of a service that are paid to an organization (rather than to a Government Official personally) and for which a supporting document can be obtained.

Since a job offer can also be a form of bribery, when hiring former Government Officials, former Employees of State-Owned Companies and Related Parties, it should be ensured that the hiring of such persons does not entail corruption risks.

Subject to applicable requirements of the Russian legislation, the Group shall ensure that the former government or municipal employee's last place of duty is notified of their acceptance.

The Compliance Officer shall be consulted in the event of a dispute or risk of unethical behavior when interacting with Government Officials, Employees of State-Owned Companies and Related Parties.

3.6 Participation in Charity, Sponsor Support and political activities

Permissible limits of participation in Charity and Sponsor Support

The Group conducts Charity and Sponsor Support activities guided by its values.

Charity cannot be provided to political parties or commercial and religious organizations. The Group shall not fund Charity and Sponsor Support projects to gain commercial advantage or where the funding of such projects could be perceived as Corruption and shall take all reasonable and necessary steps to ensure that the Group's Charity and Sponsor Support activities are not used as a cover for Corrupt Activities or any other illegal purpose.

To minimize possible corruption risks, the Group conducts checks on the recipients of the Charity or Sponsor Support, as well as on other Counterparties.

To achieve a high level of transparency, a Group company's participation in a particular charity/sponsor support project shall be formalized by a written agreement that includes the rights of the Group company to verify the intended use of the funds provided under such project (in particular, to receive a report on the use of the funds and documents confirming their accounting and expenditure). The Group monitors the targeted use of funds provided as part of Charity and Sponsor Support activities.

The Group shall not participate in political activities and shall not provide financial support to political parties, their representatives, political organizations and foundations associated with them, religious organizations and movements. The Group also shall not fund or participate in activities for political or religious agitation and propaganda, nor shall it in any other way assist for the same purpose.

The Group acknowledges the right of Employees to personally participate in political and religious life, provided that such participation takes place on their own time and is carried out personally on behalf of the Employee, without reference to their place of work. When participating in political or religious activities, each Employee shall explicitly demonstrate that their political or religious position is their own and not that of the Group.

If an Employee is elected to managerial positions, to the control and auditing bodies of a political party or organization, or nominated as a candidate for deputy and other elected positions in state and local government bodies, they shall notify the Management and the Compliance Officer at the earliest possible date.

3.7. Keeping reliable reports (records)

On the necessity of record-keeping

The Group shall strictly comply with legal requirements, including Anti-Corruption Legislation and rules applicable to record-keeping and reporting. The methods of management and accounting recording adopted by the Group shall ensure full transparency, reliability, accuracy, and completeness of all reporting documents and statements.

Each financial and economic transaction shall be registered by a primary accounting document. Misrepresentation or falsification of accounting, management and other types of records or supporting documents is not allowed.

All financial transactions of the Group shall be accounted for in reasonable detail, accurately, fairly and timely. Employees whose responsibility is to maintain records are responsible for timely preparation and submission of complete and accurate reports.

No unrecorded accounts shall be allowed in the Group, regardless of the purpose. Under no circumstances shall any informal bookkeeping be used to simplify or conceal improper transactions.

Information on transactions and commercial relations that may be subject to Anti-Corruption Legislation shall be kept for at least five years, unless a longer period is stipulated by applicable laws and internal regulations. Such information includes primary documentation, accounting records or other documents related to these transactions and relations.

3.8 Audits and reviews

On the importance of external audits and internal reviews

The Group shall regularly conduct external audits of its financial and business operations, monitor the completeness and accuracy of data reporting in accounting and management records, and compliance with the requirements of the Anti-Corruption Legislation and internal regulations of the Group, including the principles and requirements outlined in this Policy.

As part of the Group's internal review procedures, there are checks of:

- efficiency and performance, including achievement of financial and operational indicators;
- reliability and timeliness of the preparation of accounting and other reports and safeguarding of assets;

- compliance with the applicable laws and requirements of this Policy in carrying out financial and economic activities and accounting.

Based on the results of control activities and monitoring of compliance with the Anti-Corruption Policy, Anti-Corruption Legislation, and internal anti-corruption procedures and elimination of identified remarks, the Compliance Officer prepares relevant reports to be agreed upon and approved by the Management.

3.9 Reports of violations, inspections, and prohibition of prosecution of claims

How to report violations of the Anti-Corruption Legislation and Policy

Should there be a reasonable suspicion that other Employee(s), Counterparties, or other persons interacting with the Group have violated the requirements of the Anti-Corruption Legislation and this Policy, or should there be any doubt as to the interpretation of this Policy, each Employee shall report such suspicions using one of the methods listed below:

- by sending an e-mail to the Compliance Officer;
- by sending an e-mail to their line manager or, if the communication relates to the actions of their line manager, to their superior;
- through the Hotline available to all Employees on the home page of the internal information Portal.

Reports to the Hotline may be forwarded anonymously. However, having contacts for feedback allows one to find out the necessary details during the inspection and provide feedback to the requesting person more quickly.

Should an Employee have suspicions or concerns about a particular transaction or deal, the Employee shall not undertake that transaction or deal without obtaining guidance from the Compliance Officer.

The Group encourages and promotes openness and active involvement in Countering Corruption and supports each Employee who raises concerns regarding compliance with the Anti-Corruption Legislation and this Policy.

The Group shall not take retaliatory measures against persons who, in good faith, report suspected or actual violations of the Anti-Corruption Legislation or this Policy and shall review all reports received on a confidential basis, ensuring that all reports received are carefully, impartially, and competently handled.

If such an audit reveals a violation of this Policy or the Anti-Corruption Legislation, the Security Department together with the Compliance Officer shall take all possible measures to investigate and suppress such violation and apply all necessary measures of liability.

The Group considers a breach of the confidentiality of an audit or retaliatory action against individuals who, in good faith, have reported violations or facilitated an audit to be a significant non-compliance with this Policy.

3.10 Identification, assessment and prevention of corruption risks

Tasks and duties of the Compliance Officer

The Group shall regularly monitor the efficiency of implemented anti-corruption standards and procedures, and control their implementation. For this purpose, a Compliance Officer performs their duties that include applying this Policy, conducting training, monitoring, controlling the implementation of all anti-corruption procedures, providing answers to questions arising from Employees and Counterparties on the subject of compliance with this Policy and the Anti-Corruption Legislation, participating in internal investigations on revealed facts of corruption violations, and other duties stipulated by local regulations.

The Compliance Officer shall report directly to the Head of the Legal Department.

Procedures to identify, assess and prevent corruption risks include (but are not limited to):

- familiarization of Employees with this Policy and all amendments hereto against signature, as well as with other existing local regulations affecting the requirements to Employee conduct;
- regular instruction (training, public lectures, focus groups) of Employees on corruption risks and measures to prevent and minimize them, as well as regular testing of Employees' knowledge and understanding of the requirements of this Policy and the Anti-Corruption Legislation;
- participation in comprehensive inspections of Counterparties and recipients of Charity and Sponsor Support when entering (renewing) business relations with them;
- conducting internal investigations and audits to ensure that Employees comply with the requirements of this Policy and the Anti-Corruption Legislation;
- approval by the Compliance Officer of drafts of local regulations, as well as draft agreements, concluded with Counterparties and recipients of Charity and Sponsor Support for their compliance with the requirements of this Policy and the Anti-Corruption Legislation.

Measures and procedures to assess corruption risks shall cover the analysis of the Group's business processes most exposed to corruption risk and shall include the following components:

- preparing examples of possible ways of committing a corruption offense at a critical point ("corruption schemes");

- preparation of a list of positions (which is not considered to be exhaustive) of the Organization's Workers who may be involved in committing a corruption offense;
- ranking of corruption risks: assessment of the probability of implementation and possible damage from the implementation of each corruption risk, ranking of corruption risks by a degree of importance under the predetermined criteria, and prioritization of measures to mitigate corruption risks;
- development of measures to mitigate corruption risks: preparation of proposals to mitigate the identified corruption risks;
- execution, coordination, and approval of the results of corruption risk assessment: preparation and submission to the Management for approval of the register (matrix) of corruption risks and the list of positions associated with corruption risks;
- regular update and renewal of the risk matrix.

4. Prevention of Corruption

Actions taken to avoid violations of the Anti-Corruption Policy clauses

The prevention of Corruption in the Group is carried out by applying the following measures:

- pursuing a unified Countering Corruption policy, developing intolerance to corruption among Employees;
- taking incentives and other measures aimed at engaging Employees in more active participation in Countering Corruption and forming a negative attitude towards corrupt behavior;
- improvement of the internal control system;
- ensuring openness, fair competition, and impartiality in conducting financial and economic activities and in interaction with Counterparties;
- improvement of the use of property and resources, as well as the transfer of rights to use and alienation of such property;
- raising the level of anti-corruption culture by informing, training, and counseling Employees on Countering Corruption;
- introduction of appropriate requirements for Employees and candidates for managerial positions into the practice of personnel work;
- introduction of rules into the practice of personnel work, according to which long, faultless, and effective fulfillment by an Employee of their duties under the requirements of this Policy shall be considered when appointing them to a higher position.

5. Liability

Consequences of violating the terms of the Anti-Corruption Policy

The Group takes full responsibility for its obligations to comply with the Anti-Corruption Legislation and requires each Employee to strictly comply with the requirements of this Policy and the Anti-Corruption Legislation.

Should the requirements of this Policy or the Anti-Corruption Legislation be violated, Employees, regardless of their position, shall be personally liable under the applicable law and the terms and conditions of their employment contract.

Failure to comply with the Anti-Corruption Legislation and the requirements hereof shall result in disciplinary, civil, and administrative or criminal liability depending on the nature of the violation.

The Group may apply to law enforcement authorities with a petition to bring a person to administrative or criminal liability in cases where their actions are considered to constitute an administrative or criminal offense.

To Counter Corruption, the Group cooperates with law enforcement authorities in various forms, including assisting to authorized representatives of government agencies in carrying out inspections and other measures to suppress and investigate corruption offenses.

6. Miscellaneous

A few important details that have not been included in other sections

The Anti-Corruption Policy shall become effective from the date of approval by the General Director of JSC "Selectel" and shall remain in force until the date of approval of a new version. This Policy supersedes all previous Group policies on the same subject matter. If any internal rules of the Group contradict the Anti-Corruption Policy, the Policy shall prevail.

By making the Anti-Corruption Policy or its separate provisions publicly available on the official website, the Group openly declares its opposition to Corruption, welcomes and encourages compliance with the principles and requirements of the Policy by all Employees, Counterparties, and other third parties, and promotes the level of anti-corruption culture in society and among Employees.

Each Employee shall be familiarized with the provisions of the Anti-Corruption Policy against their signature under the Group's procedures.

Monitoring the relevance of the Anti-Corruption Policy and its regular updating falls within the competence of the Compliance Officer.

Terms and definitions

The following terms and definitions are used in this Policy:

Anti-Corruption Legislation

United Nations Convention against Corruption of October 31, 2003 (ratified by the Russian Federation on March 8, 2006), Criminal Law Convention on Corruption (ETS No. 173) of January 27, 1999 (ratified by the Russian Federation on July 25, 2006), U.S. Foreign Corrupt Practices Act of 1977, Criminal Code of the Russian Federation, Civil Code of the Russian Federation, Code of Administrative Offences of the Russian Federation, Federal Law of December 25, 2008. No. 273-FZ "On Countering Corruption" and other Federal Laws and subordinate regulations of the Russian Federation containing norms aimed at anti-corruption efforts with subsequent amendments and additions.

Anti-corruption clause

A section or appendix to a Group company's contract where the parties agree to prevent corrupt practices in the performance of contractual obligations and establish liability for violations.

Anti-corruption procedure

The Group's activities aimed at preserving corporate culture, compliance with rules and procedures for prevention and avoidance of corruption offenses, investigation of corruption offenses, and mitigation and/or elimination of consequences of corruption offenses.

Charity support (activities)

Voluntary activity on disinterested (gratuitous or on favorable terms) transfer of property, including money, performance of works, provision of services, rendering other support to legal entities or individuals.

Bribe

Property, valuables, monetary funds, and services that are offered, promised or given to a Government Official to influence the adoption of a resolution to cooperate with the Group or to give the Group an illegal or unfair advantage or favor.

Government Official

1. A person holding an appointed or elected position in a legislative, executive, or judicial authority of the Russian Federation or a foreign state,

2. A person performing public functions for a Russian or foreign state (officials of political parties, including candidates for political office, etc.), including for a state body, enterprise or institution,
3. A person carrying out organizational and managerial, administrative and economic functions in state and municipal institutions, state corporations, and State-Owned Companies, as well as within legal entities with state participation,
4. An official or representative of an international organization (IMF, World Bank, UN, etc.),
5. Persons holding military positions.

State-Owned Company

A commercial or non-commercial organization whose shareholders (participants) are directly or indirectly represented by the Russian Federation, municipal authorities, or a foreign state, as well as municipal authorities of a foreign state.

Group

JSC "Selectel", Selectel-Lab LLC, B-36 LLC.

Commercial bribery

Illegal transfer to a person performing managerial functions in a commercial or other organization of any property, valuables, monetary funds, provision of services of a proprietary nature, granting other proprietary rights for the performance of actions (their absence) in the interests of the giver due to the official position occupied by this person.

Counterparty

An individual or a legal entity with whom Group companies have entered into or intend to enter into a transaction.

Conflict of interest

A situation in which the personal interest (direct or indirect) of one or more Employees and (or) Related Parties affects or may affect the objective and impartial performance of their official duties (exercise of powers).

Corruption, Corrupt Practices

Abuse of official position, giving a Bribe, receiving a Bribe, abuse of authority, Commercial Bribery, or other unlawful use by an Employee of their official position contrary to the legitimate interests of society and the state to obtain a benefit in the

form of monetary funds, valuables, other property or services of a proprietary nature, other property rights for themselves or third parties, or unlawful provision of such benefits to an Employee by other individuals, as well as committing the above actions on behalf of and in the interests of the Group.

Personal interest

Possibility for the Employee to receive income in the form of monetary funds, valuables, other property, including property rights, property services, results of work performed, or any benefits (advantages) for themselves and (or) for Related Parties.

Compliance Officer

An employee responsible for implementing the compliance risk management system and performing compliance control functions. Compliance as part of the Group's management system shall include ensuring conformity of the Group's activities with the requirements of anti-corruption, tax and other laws, and local regulations, as well as excluding the involvement of the Group companies and their Employees in unlawful activities.

Payments for acceleration of formal procedures

Payments to accelerate standard administrative procedures. The procedures are usually carried out by Government Officials. Such procedures include the issuance of permits, licenses or other official documents; issuance of visas, work permits, and other immigration documents; customs clearance; state registration of immovable property or vehicles; provision of public utilities, etc.

Gift

Any value (benefit and/or service) provided without the purpose of influencing the decision concerning the donor and complying with the requirements of the Anti-Corruption Legislation in terms of its value.

Hospitality Expenses

Expenses for hospitality events held to develop the Group's business, establish or maintain business relations or promote, demonstrate and advise on products or services. Hospitality events have a valid business purpose and are not wholly intended for entertainment or deemed to be unrelated to the Group's legitimate business interests.

Countering Corruption

Activities of Employees (regardless of their position) to prevent Corruption, including identification and subsequent elimination of the causes of Corruption (prevention of

Corruption); identification, prevention, suppression, and internal investigation of corruption offenses (Anti-Corruption efforts); minimization and (or) elimination of the consequences of corruption offenses.

Workers

Individuals working under an employment contract, both full-time and part-time, as well as persons carrying out work (rendering services) under civil law contracts within the entire term of the contract.

Management

Board of Directors, General Director, Deputy General Directors, Chief Accountant, Directors for Functional Areas, Directors of Departments, and managers reporting immediately to the General Director.

Related Parties

Persons in close kinship or relationship with the Employee (parents, spouses, children, brothers, sisters, as well as brothers, sisters, parents, children of spouses and spouses of children), individuals or organizations with whom the Employee and (or) persons in close kinship or relationship with the Employee are associated by property, corporate or other close relations.

Employee

The word used collectively in reference to Management and Workers.

State-Owned Company Employee

Individuals employed on a full-time or part-time basis, as well as other temporary workers of State-Owned Companies operating in the territory of the Russian Federation or foreign countries on the basis of contracts concluded with them.

Sponsor support (activities)

Provision of financial or other support for the organization and (or) holding of any event, as well as the establishment and (or) use of any result of creative activity.