

# Code of Corporate Ethics and Business Conduct

## 1. Introduction

The Code of Corporate Ethics and Business Conduct of JSC "Selectel" and its subsidiaries (hereinafter referred to as the "Code" or "Code of Ethics") is a description of legal and ethical principles that define uniform standards, norms, requirements and rules to be observed by all Employees of JSC "Selectel" and its subsidiaries (hereinafter also referred to as the "Group"), regardless of their positions, functions and regions of operation.

The Code demonstrates the Group's commitment to high ethical standards of open and honest business conduct designed to ensure the improvement of corporate culture, adherence to the best practices of corporate governance, maintenance of the Group's business reputation and seriousness of Employees' responsibility for their actions to society, colleagues and Counterparties.

The Code of Ethics is based on the Group's corporate values:

- customer – the interests of the Group's customers always come first; customers build their business together with the Group and their success is the success of the Group;
- team – individual success is impossible without the success of the team; attention to deadlines, understanding of one's own and shared responsibility, respect for the work of colleagues, sharing experience represent the features of a true team;
- quality – if the Group's Employees decide to undertake something, they will do it well; it is better to do less, but in a way that makes one proud;
- initiative and liability – it is important to recognize that this is a joint value, as initiative and liability go hand in hand; the Group's employees do not hesitate to propose the boldest ideas and accept liability for their implementation;
- recognition – the Group celebrates the achievements of Employees and gives everyone the opportunity to be appreciated on merit;
- freedom of thought, honesty and openness – Employees of the Group are always honest with each other, they voice their opinions and admit mistakes; it is important for Employees to report and express discontent when a process goes wrong.

The provisions of this Code have been developed pursuant to the legislation of the Russian Federation, best practices, and the Group's internal documents.

Failure to comply with the Code may result in disciplinary measures imposed in accordance with the applicable requirements of the Group's internal documents and applicable laws.

## 2. Basic ethical principles

### Core principles of the Code

The Group's reputation stems from the actions of each Employee. All Employees shall seek to maintain, build, and promote the positive reputation of the Group, regardless of their position, functions or region of operation.

Employees undertake to adhere in their activities to the following principles underlying the Group's Code of Ethics:

- legality – to comply fully with the requirements of applicable laws, rules, and regulations;
- integrity – to fulfill agreements, follow the declared values, meet high standards of business ethics and contribute to the resolution of explicit and implicit Conflicts of Interest arising from the mutual influence of personal and professional activities; to ensure the protection, safety, proper and fair use of the Group's assets;
- impartiality – to make decisions, including selection of Counterparties, formulation of terms of interaction with them, carry out personnel and administrative decisions guided by transparent, fair market conditions and being unbiased, without abuse of rights and opportunities, as well as on the basis of professionally sound judgment;
- openness – to disclose, within the scope of its competence and in a timely and complete manner, the information required for submission to Russian and foreign governmental and regulatory agencies as well as to other interested parties;
- confidentiality – to comply with the requirements of the Group's internal documents regarding the preservation and use of Confidential and Insider Information obtained as a result of performing job duties;
- engagement – to promptly notify the Group of any cases of violation of this Code by Employees and to promote the positive reputation of the Group;
- development – to continuously improve the Group's business processes, follow innovations and achieve the set goals within the framework of competencies;

- caring for people – to build equal and respectful relations with colleagues and Counterparties, and to pay due attention to their interests;
- professionalism – to possess experience, knowledge and skills required to perform their duties and to strive to maintain the highest professional standards.

## 3. Areas of the Code

### Guiding points of the Group

The principles and requirements of the Code apply to all aspects of the Group's operations and business processes, including the following areas:

### 3.1 Interaction with Employees

#### Establishing communication

The Group builds interaction with Employees based on common goals, consideration of shared interests, mutual respect, integrity, impartiality, and long-term partnership. The Group cares about Employees and therefore accepts the following commitments:

- strictly complying with labor legislation of the Russian Federation and the terms of employment contracts;
- ensuring stable and decent salaries, making all necessary salary payments in a timely and full manner;
- respecting human rights and individual freedom, not allowing forced or child labor;
- preventing unauthorized disclosure of personal data;
- maintaining an environment of friendliness, mutual understanding and stability, and preventing any form of discrimination or harassment;
- creating conditions for safe, comfortable and productive work, and ensuring a decent level of health and safety;
- maintaining an open dialog and an atmosphere of trust, considering the opinions of Employees, responding to suggestions, ideas and complaints;
- supporting initiatives to improve the efficiency of business processes;
- providing equal opportunities in hiring and career development, making unbiased performance-based personnel decisions.

The Group's business reputation depends on each Employee, therefore the Group imposes the following obligations on Employees:

- conscientiously and efficiently performing their job duties, showing initiative and responsibility for the results of their work, taking care of continuous improvement of their professionalism and qualifications;
- complying with legal requirements and internal documents of the Group, maintaining the Group's business reputation and acting in its interests;
- preventing misuse of any of the Group's Assets, treating both the Group's Assets and natural resources with care;
- complying with work discipline and occupational safety rules;
- demonstrating a personal example of ethical behavior, treating colleagues and Counterparties with respect;
- adhering to the principle of zero tolerance to Corruption or other unlawful activities in any forms and manifestations;
- showing no prejudice and discrimination on the grounds of race, religion, nationality, gender, political affiliation, social background, property and official position, language of communication and other circumstances;
- refraining from any unethical, aggressive, intimidating actions, manipulation of any kind, concealment or misrepresentation of information provided and other unfair business practices;
- following the rules of fair competition, complying with applicable antitrust laws, and avoiding unfair methods of competition and business conduct;
- not using their official position for personal purposes, not allowing unjustified or unfair personnel decisions, refraining from actions or inactions that cause a Conflict of Interest;
- reporting immediately to the Management about the Group's risks, occurrence of violations of the Code and the Group's internal documents.

To promote the corporate culture and encourage compliance with the provisions of this Code, the Group Management as a whole and the heads of specific departments shall:

- set the Tone at the Top and demonstrate a pattern of ethical behavior in daily operations of the Group and in the adoption of decisions;
- taking necessary measures to resolve conflicts that have arisen and to prevent future violations of the Code;
- ensuring that Employees understand and comply with the requirements of this Code and, where necessary, providing clarifications to their Employees on the application of the provisions of the Code and other internal documents of the Group;
- creating an environment where Employees are willing to speak openly about their concerns;

- consistently enforcing compliance with the Code, and considering compliance with the Code and other internal documents of the Group when evaluating Employees;
- reporting non-compliance or potential non-compliance with applicable laws and ethical standards.

## 3.2 Interaction with Government Officials and Employees of State-Owned Companies

### Communicating with representatives of the public sector

The Group seeks to build and maintain the most transparent, constructive and open relations with Government Officials, Employees of State-Owned Companies and Related Parties in a format that does not allow for Conflicts of Interest.

Payments to accelerate formal procedures are prohibited in accordance with the Group's Anti-Corruption Policy. The Group prohibits the provision of monetary funds, Gifts, hospitality or anything of value to Government Officials, Employees of State-Owned Companies and Related Parties for the purpose of influencing the decisions of such persons to obtain, retain or secure a commercial advantage or to achieve other objectives related to decisions that may appear to be favorable to the Group's commercial interests.

Conducting business activities together with Government Officials, Employees of State-Owned Companies, Related Parties and companies that are wholly or partially owned by such persons or in which such persons have an interest may cause suspicions of a violation related to anti-corruption legislation. The Group and its Employees are strictly prohibited from entering into such commercial transactions without prior review and approval by the Compliance Officer.

The Group shall not conceal or misrepresent information requested by government authorities, shall not delay in providing such information and is to actively cooperate, within the limits of applicable law, with government authorities in the course of their inspections. When contacted by a Government Official enforcing the law, or when a request is made for an investigation/inspection by governmental or regulatory agencies, Employees shall:

- ensure that the information provided is true and accurate, that the Group's legitimate interests are protected, and that the Group will not violate applicable law by providing such information;
- immediately contact the line manager as well as the Compliance Officer before responding to a request for information, except for standard requests within the area of responsibility of the structural unit of such Employees.

Employees shall immediately contact the Compliance Officer responsible if Employees receive a lawsuit, claim or order from any governmental authority against the Group, or

if Group Employees become aware of other facts that could lead to claims against the Group by governmental authorities.

When interacting with Government Officials, Employees of State-Owned Companies and Related Parties, Group Employees should follow the requirements of this Code, the Anti-Corruption Policy, the Procedure for Interaction with Government Agencies, Officials and Representatives of State-Owned Companies and other internal documents of the Group.

## 3.3 Interaction with Counterparties

### Methods of cooperation with Counterparties

The Group expects that Counterparties:

- conduct business in a fair, transparent and ethical manner, share the Group's ethical principles and do not tolerate Corruption;
- respect human rights and freedoms, do not use forced and child labor and do not tolerate discrimination, harassment and persecution on any grounds;
- do not allow any influence on the decisions taken (Conflict of Interest);
- comply with applicable laws of the Russian Federation (including anti-corruption, antitrust laws, personal data protection laws, etc.);
- ensure environmental safety as well as occupational health and safety of Employees;
- bear responsibility for the quality and safety of their products and services.

The Group builds cooperation with Counterparties based on maintaining mutually beneficial long-term relations, therefore the Group assumes mutual responsibility:

- to comply with all applicable provisions of legislation in force;
- to be guided by the principle of fair competition that promotes the search for new ideas, solutions and improvement of business processes;
- to take the measures required to fully eliminate Corruption and discrimination, prevent abuse and other misconduct;
- to respect and value the opinions of their Counterparties, execute projects professionally and take responsibility for the results of work;
- to mitigate risks of harm to health and the environment, and to avoid forced and child labor;
- not to allow personal gain to influence the fulfillment of business tasks, and to protect the Group's Assets.

## 3.4 Fair competition

### Ethics in a competitive environment

The Group maintains open and fair interaction in a free market and complies with antitrust laws, including the law on protection of competition.

When entering into contracts, the Group companies seek to fairly allocate risks between the parties and refrain from including provisions in contracts that unreasonably restrict competition. Employees shall comply with the requirements of applicable laws and the Group's internal documents regulating procurement.

In organizing and conducting procurement, the Group shall be guided by the following principles:

- the principle of competition shall be exercised through the implementation of procedures aimed at creating a reasonable level of competition among procurement participants, as well as through the absence of restrictions on admission to participation in procurement by setting unreasonably excessive requirements for procurement participants;
- the principle of information transparency shall be implemented through the use of open competitive procedures as a priority form of procurement;
- the principle of economic feasibility shall be fulfilled through assessments of the need for procurement in terms of economic feasibility at any stage of procurement activities;
- the principle of transparency of the procurement procedure shall be exercised through the possibility of monitoring and control of procurement activities at any stage thereof;
- the principle of compliance with the main provisions of the Group's Anti-Corruption Policy shall be exercised through inclusion of Anti-Corruption Clauses in contracts and other documents, including those establishing relations with the Group's Counterparties.

The Group builds relations with Competitors on the principles of mutual respect, refrains from unfair competition, unethical methods of gaining competitive advantage and abuse of position. Employees are prohibited from pursuing the following:

- providing Competitors with information on prices, terms and conditions of sales, as well as any other information subject to confidentiality;
- illegally obtaining confidential information about Competitors (theft, collusion, bribery, espionage, etc.);
- entering into any formal or informal agreement with Competitors, including pricing or market sharing;

- making false statements about Competitors or their products and services, giving unreliable and evaluative comments about the work of Competitors.

The Group shall use only fair and accurate advertising means and shall not violate the law or the rights of third parties in its advertising and marketing activities.

Employees shall be entitled to gather information about Competitors by reviewing publicly available information or making inquiries in an ethical and lawful manner. In particular, Employees shall be entitled to use information received:

- from publicly available documents filed with government agencies, public speeches by top company officials, various reports, press releases, news articles, etc.;
- from third parties, unless there are reasons to believe that such parties have contractual/other legal obligations not to disclose such information, or such information was obtained using illegal methods and may affect the Group's operations.

## 3.5 Record-keeping, disclosure and external communications

### Data transparency

The Group shall keep accurate, reliable and transparent records of the Group's activities, based on which it prepares its financial and accounting statements. The Group's accounting and financial reporting comply with Russian Accounting Standards and International Financial Reporting Standards.

The maintenance of false or misleading records and documents is strictly prohibited in the Group, and Employees are required to ensure that the documents and records for which they are responsible are properly maintained. Employees are prohibited from failing to report any amounts or assets, or falsifying, destroying and concealing any documents or records for the purpose of misrepresentation.

The Group's documents shall be stored, presented and destroyed in accordance with applicable laws and the Group's internal documents.

The Group is building an efficient system of internal control over the reliability of financial reporting to provide stakeholders with correct and timely information on the Group's financial and economic activities.

The Group seeks to provide its Employees, Counterparties and other interested parties with sufficient information about its activities. When disclosing information, the Group adheres to the principle of maintaining a reasonable balance between information transparency and safeguarding the Group's commercial interests.

Employees shall take all measures to ensure full and timely provision of information to government and regulatory agencies and other interested parties. The information provided shall meet all legal requirements and shall not contain wilfully false statements or omissions. Information shall be disclosed within the timeframes and pursuant to the procedure stipulated by the legislation and internal documents of the Group and shall be carried out by authorized Employees.

The Group emphasizes the disclosure of information on financial position, which is prepared with the following principles:

- keeping financial and accounting records and preparing the Group's reports in accordance with the legislation in force;
- ensuring compliance with the requirements of accounting and reporting standards and internal control system in the preparation of accounting and financial statements;
- accurately and completely recording all necessary entries and financial transactions, as well as all necessary additional information, in the Group's financial and accounting documents;
- reliably reflecting the Group's assets, liabilities, profits and losses in the Group's financial and accounting records;
- maintaining the absence of wilfully false or deliberately misrepresented information in the Group's financial and accounting records;
- reporting all transactions with appropriate entries, specifying the necessary details and reflecting them in the appropriate accounts and accounting periods.

Given that negotiations with Counterparties, cooperation with the media and representatives of governmental authorities, any actions on the Internet related to the Group may carry reputational risks or risks of disclosure of confidential information, only officially authorized persons of the Group may represent its interests.

The Group takes a responsible approach to its image in social networks, to statements and published materials, and does not use derogatory and offensive expressions.

All Employees shall be guided by the Group's internal documents related to information processing and disclosure, including documents regulating the rules for handling information representing commercial secrets and/or Insider Information.

## 3.6. Protection of Confidential Information

### Information security

Confidential information is any information that the Group does not publicly disclose, including Insider Information and personal data.

The Group assumes a responsible approach to preserving its own Confidential Information and does not request, accept or use any Confidential Information of Counterparties, Competitors, Employees, other than that which is lawfully obtained by the Group from public sources or under contract with a person authorized to provide such information.

Given that the Group strictly complies with data protection legislation, Employees who have access to Confidential Information (whether or not provided to them by the Group) shall:

- use such information only within the scope of their job duties and consult with their line manager and the Compliance Officer if in doubt;
- prevent the transfer of Confidential Information to third parties, including Related Parties, except as required by law or the Group's internal documents;
- protect Confidential Information both during employment and after its termination.

The Group supports and respects the principle of respect for the confidentiality of Employees' personal life and data, including through:

- storing only those personal data that is necessary for the efficient operation of the Group's business or to comply with legal requirements;
- restricting access to personal data to all Employees, except for those who are authorized to have access due to operational needs;
- maintaining non-disclosure of the Employees' personal information to third parties without the consent of the personal data subject and a proper legal basis.

## 3.7 Identification and management of Conflict of Interest risks

### Detecting and resolving Conflicts of Interest

The Employees are obliged to act in good faith and reasonably in the interests of the Group when performing their job duties, doing that in accordance with applicable laws, the employment contracts and the Group's internal documents. One of the basic conditions for Employees to perform their job duties in good faith is to have no Conflicts of Interest.

Employees are authorized to engage in any lawful activity, provided that such activity does not affect the performance of their direct job duties and does not conflict with or prejudice the interests of the Group.

Employees shall carefully consider whether any of their actions or relations, including those outside the Group, could give rise to a Conflict (or perceived Conflict) of Interest.

Should a Conflict of Interest or any kind of doubt about its potential occurrence arise, Employees shall adhere to the principle of abstaining and disclosing: if it is impossible to avoid participating in an event or activity that creates a Conflict of Interest, an Employee shall disclose it to Management and the Compliance Officer and abstain from participating in relevant decisions until the Conflict of Interest has been resolved.

The procedures aimed at preventing and minimizing the risks associated with a Conflict of Interest, as well as the procedure for conduct in the event of a Conflict of Interest, are set out in the Group's Anti-Corruption Policy and other internal documents.

## 3.8 Appropriateness of business Gifts and Hospitality Expenses

### Donation and acceptance of Gifts in business practice

The Group accepts Gifts and Hospitality Expenses which are inherent to common business practice and do not contradict the requirements of applicable law. Gifts and Hospitality Expenses shall not affect the ability of any party to the interaction (e.g., Employee or Counterparty) to make unbiased and fair decisions.

Employees are prohibited from using their official position for personal gain, including:

- to receive Gifts and other benefits for themselves or others in exchange for the Group's provision of any services, actions or sharing of Confidential Information;
- to receive Gifts and other benefits on the grounds not stipulated by the Group's internal documents, employment contracts for themselves and other persons in the course of performing their official duties;
- to receive Gifts and other benefits for themselves and others in the conduct of the Group's business, including both before and after negotiating transactions or agreements;
- to obtain services, including loans and borrowings, from persons directly or indirectly related to the Group, other than credit institutions or service providers offering loans or similar services to third parties on comparable terms and conditions in the ordinary course of business.

Gifts and Hospitality Expenses that Employees on behalf of the Group may give to other persons and organizations, or that Employees give in connection with their employment with the Group, shall:

- be directly related to the Group's legitimate business objectives and shall also be appropriate to the occasion (e.g., common holidays);
- be reasonably justified, reasonable and within the bounds of business courtesy;
- not be so frequent or expensive as to raise doubts about their appropriateness;

- not constitute a concealed reward for a service, action, inaction, making a certain decision, etc., or an attempt to influence the recipient for another illegal and unethical purpose;
- not contradict the requirements of this Code of Ethics, other internal documents of the Group and applicable laws.

Should there be any doubt as to the acceptability of Gifts/Hospitality Expenses or other questions regarding the handling of Gifts/Hospitality Expenses, Employees shall seek advice from the Compliance Officer.

The detailed rules relating to the donation and acceptance of Gifts, the incurrance of Hospitality Expenses and their eligibility criteria are set out in the Group's Anti-Corruption Policy and Gifts and Hospitality Policy.

### 3.9 Compliance with requirements regarding participation in Charity, Sponsor Support and philanthropic and political activities

#### Participation in public and charity initiatives

The Group actively participates in the life of society, seeks to contribute to the solution of social problems, and therefore carries out Charity and Sponsor Support activities in accordance with the Group's values.

The Group does not fund charity and sponsor support projects in order to gain commercial advantage in specific Group projects or if funding such projects could be perceived as Corruption.

Charity and Sponsor Support projects involving the Group require additional procedures in accordance with the Anti-Corruption Policy and other internal documents of the Group. Employees have the right to participate in Charity activities on personal initiative. Such participation shall not involve the Group's resources, violate applicable laws and this Code, lead to a Conflict of Interest or otherwise compromise the Group.

The Group does not participate in political activities, does not support political parties or related foundations and organizations, candidates for members of parliament or specific politicians, religious organizations and movements.

Further information on this topic is provided in the Group's Anti-Corruption Policy.

### 3.10. Prevention of Corruption and improper payments

## Efforts against Corruption and unacceptable payments

The Group strictly adheres to the principle of rejection of Corruption in any form or manifestation, including in its interaction with representatives of authorities, local governments, political parties, and any other persons, in carrying out day-to-day activities and projects in any of the areas of the Group's activities and business presence.

The Group's Anti-Corruption Policy is based on the following key rules:

- setting out by the Group Management of ethical behavior standards by personal example and familiarization and training of Employees;
- conducting periodic corruption risk assessments;
- development, implementation, compliance and improvement of anti-corruption procedures, implementation of monitoring and control.

Employees shall comply with the norms of anti-corruption legislation, as well as the norms contained in the Group's internal documents aimed at preventing and minimizing corruption risks.

Employees are prohibited from making Improper Payments (including Payments for Acceleration of Formal Procedures), i.e., payments of any kind (e.g., cash, commissions, gift certificates, services, discounts, loans) for benefits, issues, administrative procedures (including acceleration, simplification), unless such actions are legally required. An offer, demand, guarantee or agreement to accept an Improper Payment is equally prohibited.

Employees shall report all risks and instances of Corruption to the Compliance Officer, their line manager or the Hotline.

## 3.11. Countering fraud, legalization (laundering) of proceeds of crime and financing of terrorism

### Prevention of financial crime

The Group has zero tolerance for any form of fraud and therefore takes measures to prevent and detect fraudulent activities based on the following principles:

- disseminating accurate information on fraud and knowledge on counter-fraud;
- conducting periodic fraud risk assessments;
- developing, implementing and improving control measures (including policies and procedures to mitigate identified fraud risks), managing them and implementing the monitoring.

An important part of the Group's culture lies in the compliance with the Group's Code of Ethics and the voluntary reporting by Employees of any facts or suspicions of violations of the law to the Compliance Officer or to the Hotline.

The Group shall comply with all requirements of anti-money laundering and anti-terrorist financing legislation. The Group applies all available measures to deal only with reliable Counterparties that conduct legitimate business and derive their revenues only from legitimate sources.

The Group expects its Counterparties to engage in appropriate ethical behavior and maintain an anti-fraud culture.

## 3.12. Careful treatment of the Group's Assets

### Mindful management of Assets

Employees shall treat the Group's Assets with care and ensure their effective use for legitimate business purposes, preventing theft, damage, waste, negligence, use for illegal or unethical purposes, minimizing the risk of possible losses and damage to the Group's goodwill. The use of Group Assets for personal purposes is considered to be unacceptable.

The Group's intellectual property represents one of the Group's key Assets. The results of intellectual labor, which were created as part of employees' work duties, constitute the property of the Group.

The Group does not use its systems to infringe Intellectual Property Rights (e.g., unauthorized copying or forwarding of information subject to Intellectual Property Rights).

Employees shall respect the legitimate rights and interests of third parties and shall not illegally use the Intellectual Property of third parties in their work.

## 3.13. Environmental protection and occupational health and safety

### Environmental safety

The Group cares about the health and well-being of its Employees, so it prioritizes providing safe and comfortable working conditions and maintaining a healthy lifestyle. The Group develops and implements a range of health and safety measures, including workplace safety, Employee training and supervisory activities.

The Group is committed to ensuring compliance with all health and safety legislation and regulations, with safety in the workplace depending not only on the measures taken

by the Group but also on the competence of Employees. Each Employee shall ensure that the workplace is safe and secure for themselves and their co-workers.

The Group supports the Employees' efforts to improve their own health and lead a healthy lifestyle, and organizes sports events for Employees. The Group's operations are based on the principles of sustainable development, which allows it to control and minimize its impact on the environment.

Employees shall comply with the rules set out in the Group's internal documents on environmental protection and occupational health and safety and refer to them for further information on the Group's position and practices on health, safety and environmental protection.

## 3.14. Compliance with laws and Group policies

### Significance of adherence to the Code

The Group seeks to comply with the laws and regulations governing the Group's operations and cooperates with governmental and regulatory authorities in the enforcement of legislation, should it be required.

This Code is based primarily on the presumption that Employees fully comply with applicable laws and the requirements of the Group's internal documents. The Code does not describe all laws, regulations or internal requirements that may apply to Employees. Certain provisions of the Code and the procedure for their implementation are detailed in the Group's internal documents, including policies, regulations, provisions, procedures, job descriptions and employment contracts.

Employees shall make sure they know the rules that apply directly to their work. Should any questions arise, Employees can find the necessary information on the internal information portal and in the Group's internal policies and procedures, as well as contact their manager or the Compliance Officer.

If the Group operates in countries where applicable laws, rules, regulations, business practices and social norms differ from those in the Russian Federation, the Group shall adhere to the policy of compliance with national and local legislation. The fact that certain standards of conduct are legally prohibited, but these prohibitions are not put into effect or their violation is not criticized or condemned by society, cannot justify unlawful actions on the part of Employees.

## 3.15. Reports of violations

### Ways to report violations

The Group supports a culture where it is crucial to report any breach of corporate ethics, business conduct or legal requirements regarding the Group.

Should an Employee have any doubts about the ethics or legality of their actions or the actions, omissions or suggestions of other Employees, Counterparties or other persons who interact with the Group, they may report them in the following ways:

- 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 made anonymously, while having the contact information enables the Group to find out the necessary details during the inspection and to provide feedback to the person who contacted the Hotline more quickly. In any case, the Group shall guarantee impartial verification, confidentiality and the absence of any retaliation for those who report violations.

## 4. Informing and training

### Consulting and training of employees

The requirements of this Code shall be communicated to all Employees during the hiring process. All Employees shall routinely confirm by signing a special form that they are familiar with the Code and agree to abide by it. If for any reason an Employee has not familiarized themselves with the Code or signed an acknowledgement form, they are not relieved of their obligation to comply with the Code.

Measures to ensure that Employees properly understand and comply with the requirements of the Code of Ethics include preparing training and information materials, publishing articles via the Group's internal information resources, and training and consulting of Employees on compliance with the Code of Ethics.

All Employees receive mandatory Code of Ethics training at least every two years or in the event of a significant change in the relevant Code of Ethics and/or applicable law.

## 5. Miscellaneous

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

The Code of Ethics shall be approved by the General Director of JSC "Selectel" and constitutes a public document which can be freely accessed on the official website of the Company.

Provisions of this Code of Ethics shall apply to all Group companies.

Should there be any questions, doubts related to the application of internal regulations, or difficulties in the ethical assessment of their own or others' actions or omissions, Employees shall seek clarification from their line manager, a superior or Compliance Officer.

## Terms and definitions

The following terms and definitions are used in this Code:

### Assets

The Group's assets, including tangible assets, cash, intellectual property rights, know-how, business process data, network resources and written correspondence and information transmitted and received via or stored in the Group's e-mail and other communication systems.

### 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.

### Hotline

A tool that can be used to submit a message that, in the opinion of the person contacted, has indications of non-compliance with the Code of Ethics or other offenses.

### Government Official

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 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.

## Insider Information

Precise, specific information that has not been disseminated/provided (including information constituting commercial, official and other secrets protected by law), the dissemination/provision of which may have a material impact on the value of the Group's assets.

## Intellectual Property

Results of intellectual activity, including works of science, computer programs, databases, inventions, utility models, industrial designs, integrated circuit topologies, trade secrets ("know-how"), trade names, trademarks and service marks, commercial designations.

## Competitor

An individual / legal entity that provides products / renders services / performs work similar to those provided / rendered / performed by the Group companies.

## Counterparty

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

## Confidential Information

Information that has actual or potential commercial value as it is unknown to third parties and does not involve access to it on a legal basis, as well as due to the fact that the holder of this information takes measures to protect its confidentiality.

## Conflict of interest

A situation where 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 for third parties, or unlawful provision of such benefit 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, 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 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 for entertainment or deemed to be unrelated to the Group's legitimate business interests.

## 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.

## 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.

## 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.

## Tone at the Top

Implementation of values and practical adherence to the Group's internal documents, as demonstrated by the Management. The Management demonstrates by personal example a model of ethical behavior, compliance with the Group's internal documents

as well as with the requirements of applicable laws, and serves as a guide to the corporate culture for Employees.