

APPROVED BY

Order No. 50 of the Director General
of Delo MC of 15 September 2021

Director General of Delo MC

_____ I.A. Yakovenko

Delo Management Company
ANTI-FRAUD AND ANTI-CORRUPTION POLICY

Moscow
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1. General

1.1. This Anti-Fraud and Anti-Corruption Policy (“this Policy”) is an internal regulation of Delo Management Company (“Delo MC”), the holding company of Delo Group, 70% of which is owned by its founder, Sergey Shishkarev, and 30% of which is owned by Rosatom State Corporation. This Policy outlines the key anti-fraud and anti-corruption principles applied at Delo Group.

Delo Group (“Delo Group”), Russia’s largest transportation and logistics group, applies a zero-tolerance policy for any form or manifestation of corporate fraud or corruption, including bribery, abuse of power or authority, corrupt practices or any other improper conduct that may result in personal benefit and may be recognized as Corporate Fraud as defined in this Policy.

1.2. This Policy has been developed in accordance with the Federal Law “On Combating Corruption”, the Guidelines for Developing and Adopting Organizational Measures to Prevent and Combat Corruption issued by the Ministry of Labor and Social Protection of the Russian Federation, other anti-fraud and anti-corruption laws and regulations. This Policy is intended to supplement the Code of Business Conduct of Delo MC.

1.3. As used in this Policy, the following **key terms** shall have the following meanings:

“**Associate**” means any manager or employee of a Delo Group company, or any other person who, either directly or indirectly, personally or through an intermediary, acts for or on behalf of a Delo Group company.

“**Bribe**”, as defined in Articles 290 and 291 of the Criminal Code of the Russian Federation, means receiving or giving, either personally or through an intermediary, any money, securities, valuables, favors or property rights by or to a public official, foreign official or an official of a public international organization in exchange for any action (omission) in favor of the briber or the persons represented by him/her, if such action (omission) is within the official powers of such official or if such official—by virtue of his/her official position—may contribute to such action (omission), or for general preferential treatment and facilitation.

“**Hotline**” means a variety of communication channels designed to report suspected or actual instances of Corporate Fraud, Corrupt Practices, Conflict of Interest, unfair competition, improper business conduct or any other improper behavior.

“**Abuse of Power**”, as defined in Article 201 of the Criminal Code of the Russian Federation, means the use of power by a person holding a leading position in a business or other entity, contrary to the legitimate interests of the entity, for the

purpose of obtaining advantages or benefits for himself/herself or for other persons, or for the purpose of causing harm to other persons.

“Official” means any person who acts as a representative of the government or performs any organizational, managerial, administrative or business functions in a governmental body, local governmental body, state or municipal institution, state non-budget fund, state corporation, state enterprise, public corporation, state or municipal unitary enterprise, or in a business entity in which the Russian Federation or a constituent entity of the Russian Federation or a municipal entity of the Russian Federation directly or indirectly (through controlled persons) controls more than fifty percent of the votes of the supreme governing body or has the right to appoint (elect) the single-person executive body and/or more than fifty percent of the members of the management board, or in a joint stock company in respect of which the Russian Federation or a constituent entity of the Russian Federation or a municipal entity of the Russian Federation has a special right to participate in the management of such joint stock company, or in the Armed Forces of the Russian Federation, other military forces and military formations of the Russian Federation.

“Personal Interest” means the possibility that a Delo Group employee may receive a reward in the form of money, valuables, including property rights, favors, deliverables or other benefits (advantages), in any of the following ways:

- personally,
- through close relatives or in-laws,
- through persons who are associated with such employee through property, corporate or other relationships, in respect of whom it has been established that they are acting under the control and/or for the benefit of such employee (and not for their own benefit) as a result of an agreement reached with the employee in any form.

“Kickback”, as defined in Article 204 of the Criminal Code of the Russian Federation, means the improper giving of any money, securities, valuables, improper favors or property rights to a person holding a leading position in a business or other entity (or to any other person designated by such person) in exchange for an action (omission) to the benefit of the giver or other persons, if such action (omission) is within the powers of such person or if such person—by virtue of his/her position—may contribute to such action (omission).

“Counterparty” means any Russian or foreign legal entity or individual with whom Delo MC and/or a company controlled by Delo MC enters into a contract, other than an employment contract.

“Conflict of Interest” means a situation in which the Personal Interest (direct or indirect) of a Delo Group employee affects or may affect the performance of his/her professional duties or in which a conflict arises or may arise between the Personal Interest of a Delo Group employee and the rights and

legitimate interests of Delo Group, and which may damage the rights and legitimate interests, assets and/or business reputation of Delo Group.

“Corporate Fraud” means any action or omission by an individual and/or legal entity with the intent to obtain benefits for himself/herself/itself or for other persons to the detriment of Delo Group and/or with the intent to cause financial and/or non-financial damage to Delo Group through deception, breach of trust, misrepresentation or otherwise. Corporate Fraud may include misrepresentation of financial statements, Corrupt Practices, embezzlement and other misconduct, including willful damage, with respect to the assets of Delo Group.

“Corrupt Practice” means abuse of authority, bribery, Abuse of Power, Kickback or any other improper use by an individual of his/her official position, contrary to the legitimate interests of the public and the government, for the purpose of obtaining for himself/herself or for other persons any benefits in the form of money, valuables, other property, favors or property rights, or the unlawful provision of any such benefit to the aforementioned individual by any other person. Any such act committed for or on behalf of a legal entity shall also constitute a Corrupt Practice.

“Anti-Fraud” means a set of measures designed to identify, prevent, investigate, and eliminate the causes of, Corporate Fraud.

“Anti-Corruption” means the activities of the federal, regional and local government agencies of the Russian Federation, public institutions, bodies and individuals, within the scope of their authority, to:

- a) prevent Corrupt Practices, including by identifying and eliminating the causes thereof (preventing corruption),
- b) identify, prevent, combat, expose and investigate Corrupt Practices (combating corruption),
- c) mitigate and/or eliminate the consequences of Corrupt Practices.

2. Goals and Objectives of this Policy

2.1. The **goals** of this Policy are to:

- mitigate the risk of Corporate Fraud and the risk of Delo Group managers and employees (regardless of their position), members of governing bodies, representatives of Counterparties being involved in Corrupt Practices;
- provide Delo Group’s Associates, investors, business partners and Counterparties with a uniform understanding of Delo Group’s zero-tolerance policy for any form or manifestation of Corporate Fraud;
- establish the obligation of Delo Group employees and members of governing bodies to know and comply with the key requirements of the Anti-Corruption laws and regulations and internal Anti-Fraud regulations.

2.2. The **objectives** of this Policy are to:

- establish Delo Group's internal Anti-Fraud and Anti-Corruption framework;
- communicate to Delo Group employees and others the basic principles and requirements applicable to Delo Group's activities and employees with respect to compliance with the applicable Anti-Corruption laws and regulations;
- summarize and explain Delo Group's Anti-Fraud and Anti-Corruption procedures and measures and how they are implemented,
- provide communication channels for reporting instances of Corporate Fraud;
- define the Anti-Fraud powers and responsibilities of Delo Group employees.

3. Principles of this Policy

This Policy is based on the following principles:

3.1. Regulatory compliance and adherence to generally accepted standards.

The Anti-Fraud measures implemented at Delo Group shall comply with the Constitution of the Russian Federation, generally accepted principles and norms of international law, international treaties entered into by the Russian Federation, the laws of the Russian Federation and other regulations applicable to Delo Group companies, and customary business practices.

3.2. Adherence to Delo Group's uniform Anti-Corruption policy.

This Policy has been developed in accordance with Delo Group's uniform Anti-Fraud and Anti-Corruption principles and methods, including those aimed at ensuring that Delo Group employees observe the rules of Anti-Corruption conduct and at mitigating corruption risks.

3.3. Leading by example.

Managers at all levels at Delo Group companies shall set an example of zero tolerance for Corporate Fraud and shall play a key role in building the Anti-Fraud framework.

3.4. Zero tolerance for Corporate Fraud.

Delo Group is committed to the principle of zero tolerance for any form or manifestation of Corporate Fraud in its production, investment and other activities. This principle implies that it is strictly forbidden for any Associate of a Delo Group company to engage, either directly or indirectly, in any Corrupt Practice or any other form of Corporate Fraud, regardless of the business practices prevailing in a particular country.

3.5. Risk appropriateness and effectiveness of Anti-Corruption procedures.

Delo Group companies shall design and implement a framework of Anti-Corruption procedures that are reasonably proportionate to the identified corruption risks. Delo MC shall ensure the implementation of the most transparent Anti-Corruption procedures within those Delo Group's business processes that are exposed to corruption risks. Delo Group seeks to implement Anti-Corruption procedures that are cost-effective, easy to implement and deliver meaningful results. Anti-Corruption procedures shall be reviewed, improved and updated to reflect changes in the external and internal environment.

3.6. Due diligence.

Delo Group companies shall conduct due diligence on their Counterparties, business partners and job applicants before deciding whether to enter into or continue business or employment relationships with such persons to ensure that such persons are trustworthy, do not tolerate corruption and do not have any Conflict of Interest, and, prior to entering into such relationships, shall inform such persons of the Anti-Corruption procedures implemented at Delo Group.

3.7. Employee involvement and awareness.

Delo Group encourages its Associates to immediately report any actual or suspected violations of this Policy and any circumstances that may indicate Corporate Fraud, and to make suggestions and proposals on how to improve the Anti-Fraud framework. Delo Group employees shall be informed of the provisions of Anti-Corruption laws and shall actively participate in the development and implementation of Anti-Corruption procedures.

3.8. Oversight and regular monitoring.

Delo Group shall routinely and regularly monitor the effectiveness of the Anti-Fraud standards and procedures implemented at Delo Group and shall supervise the adherence to such standards and procedures in accordance with the internal regulations of Delo Group companies.

3.9. Liability and inevitability of punishment.

Delo Group employees, regardless of their position, length of service or other circumstances, shall be liable for any failure to comply with the applicable Anti-Corruption laws and the internal Anti-Fraud regulations of Delo Group companies, and, in the event of their involvement in a Corrupt Practice, may be held liable at the discretion of their employer, the competent law enforcement agency or any other authorized person, in accordance with, and on the grounds set forth in, the applicable laws, internal regulations, and employment contracts.

3.10. No retaliation against whistleblowers.

Delo Group guarantees that no employee shall be retaliated against for making a report (other than a knowingly false report) of:

- a suspected instance of Corporate Fraud or Corrupt Practice, including the employee's refusal to pay a Bribe, a Kickback or to act as an intermediary in a bribery, a suspected violation of the due diligence procedures, or any other misconduct, including where the employer and/or another Delo Group company has suffered a loss or failed to obtain a business or competitive advantage as a result;
- an employee of Delo Group being induced to engage in a Corrupt Practice;
- a violation of this Policy or other internal Anti-Fraud regulations of Delo Group companies.

4. Scope of this Policy

4.1. This Policy applies to all employees of Delo Group companies and to persons employed at Delo Group companies, regardless of their position or the functions they perform. This Policy also applies to other Associates.

4.2. The Anti-Corruption procedures may specify the conditions under which this Policy shall apply to Counterparties with whom Delo Group companies have contractual relationships.

4.3. This Policy shall become binding on the companies controlled by Delo MC and on other companies in which Delo MC directly or indirectly owns shares once this Policy has been approved and enacted in accordance with the charters of such companies.

5. Persons Involved in the Implementation of this Policy

5.1. Effective Anti-Fraud management depends on the following parties working together in an efficient and timely manner:

- Director General of Delo MC;
- single-person executive bodies of the companies controlled by Delo MC;
- structural subdivision / officer responsible for the implementation of Anti-Corruption measures;
- managers at all management levels;
- employees.

5.2. The distribution of Anti-Fraud roles among the above participants is as follows:

5.2.1. The Director General of Delo MC shall:

- approve the Anti-Fraud and Anti-Corruption Policy and any amendments or additions thereto;
- monitor the results of the implementation of the Policy and the application of the Anti-Corruption procedures at Delo Group;

- supervise the conduct of special audits (investigations) into potential instances of Corporate Fraud, Corrupt Practices or other improper conduct, organize the monitoring of the effectiveness of the system for reporting suspected instances of Delo Group employees or others engaging in Corrupt Practices, and oversee the implementation of measures taken by the executive bodies of the companies controlled by Delo MC in connection with the operation of such system;
- be responsible for the implementation of this Policy at Delo MC;
- designate the structural subdivision / officer responsible for the implementation of Anti-Fraud measures at Delo MC and define the scope of authority of the heads of structural subdivisions with respect to Anti-Fraud efforts.

5.2.3. Single-person executive bodies of the companies controlled by Delo MC shall:

- be responsible for implementing this Policy at the relevant Delo Group company;
- ensure compliance with the applicable Anti-Fraud laws and internal regulations at the relevant Delo Group company;
- designate the structural subdivision / officer responsible for the implementation of Anti-Fraud measures and define the scope of authority of the heads of structural subdivisions with respect to Anti-Fraud efforts.

5.2.4. Structural subdivisions / officers responsible for the implementation of Anti-Fraud measures at Delo MC and its controlled companies shall:

- develop an Anti-Fraud and Anti-Corruption program and shall ensure that its implementation is properly monitored;
- develop Anti-Corruption procedures and ensure that they are properly adopted and that their implementation is properly monitored;
- initiate revision of the internal Anti-Fraud regulations;
- identify and assess corruption risks;
- conduct investigations to identify instances of Corporate Fraud committed by employees;
- receive, consider and investigate reports of instances in which employees have been induced to engage in Corrupt Practices for or on behalf of another entity, or in which Corrupt Practices have been committed by employees, Counterparties or others;
- together with the structural subdivisions responsible for human resources management and legal support, organize training sessions dedicated to the prevention and combating of Corporate Fraud and compliance with

applicable Anti-Corruption laws, provide one-on-one consultations to employees, and inform employees on Anti-Fraud matters;

- review and assess the current state of the Anti-Fraud framework, the adequacy and effectiveness of the Anti-Corruption framework, and, based on the results of such review and assessment, submit proposals to the single-person executive body on how to improve the overall structure and effectiveness of the activities aimed at preventing Corrupt Practices;
- review and verify the information disclosed in the Conflict of Interest statements and assess the trustworthiness of the Counterparties;
- conduct audits and internal investigations into instances of Corporate Fraud and Corrupt Practices, determine the reasons that led to such instances, and prepare recommendations on how to prevent the likelihood of Corrupt Practices in the future;
- assist authorized representatives of supervisory and law enforcement agencies in conducting Anti-Corruption audits at Delo Group companies;
- deal with law enforcement agencies on matters relating to the prevention or investigation of corruption offences, in particular, in the conduct of any special search and investigation activities;
- assess the results of the Anti-Corruption efforts and prepare relevant reports for the management and shareholders of Delo Group companies;
- assist the executive bodies in investigating instances of Corporate Fraud or Corrupt Practices committed by employees of Delo Group companies or by third parties.

5.2.5. Heads of structural subdivisions at Delo MC and its controlled companies shall ensure that Anti-Fraud and Anti-Corruption activities are properly carried out within their area of responsibility and within the scope of their authority, and, in particular, shall:

- ensure the effectiveness of the existing internal controls;
- within the scope of their authority, identify processes and procedures that are exposed to the risk of Corporate Fraud;
- together with the structural subdivisions responsible for human resources management and legal support, take disciplinary actions against employees guilty of or involved in Corporate Fraud or violations of internal controls;
- assist in the conduct of preliminary reviews or internal investigations into instances of Corporate Fraud or Corrupt Practices;
- assist the specialists conducting a preliminary review and/or internal investigation, by providing access to the premises, facilities and documents necessary for such preliminary review and/or internal investigation;

- promptly inform the structural subdivision / officer responsible for the implementation of Anti-Fraud measures about any indication of Corporate Fraud or attempted Corporate Fraud within their area of responsibility.

5.2.6. Employees of Delo MC and its controlled companies shall:

- at all times comply with the applicable laws, principles, requirements and rules set forth in this Policy and the Code of Business Conduct and with other internal Anti-Fraud regulations;
- perform the duties assumed in connection with the implementation of Anti-Fraud monitoring procedures and functions;
- within the scope of their authority, participate in the development and implementation of Anti-Fraud monitoring procedures;
- refrain from committing and/or participating in Corrupt Practices for or on behalf of Delo Group companies, as well as from any conduct that could be interpreted by others as the willingness to commit or participate in Corrupt Practices for or on behalf of Delo Group companies;
- promptly inform his/her immediate supervisor or the structural subdivision / officer responsible for the implementation of Anti-Fraud measures of any inducement to engage in Corrupt Practices, of any Corrupt Practices committed by other employees, Counterparties or others, or of any potential or actual Conflict of Interest of which he/she has become aware;
- assist in the conduct of audits, preliminary reviews and internal investigations, including by providing explanations, necessary documents and information within the scope of the employee's authority and in accordance with applicable laws and internal regulations.

6. Anti-Fraud Standards, Activities and Measures

Anti-Fraud measures

6.1. Anti-Fraud measures are implemented at Delo Group in accordance with the internal regulations of Delo MC and its controlled companies on the prevention of Corporate Fraud and Corrupt Practices, on internal control and compliance with the business ethics rules.

Implementing the rules governing the conduct of Delo Group employees

6.2. To build an Anti-Corruption culture at Delo Group, general business ethics rules and principles of conduct for Delo Group employees shall be established to shape the ethical and conscientious behavior of employees.

Such general rules and principles of conduct shall be set forth in the Code of Business Conduct.

6.3. Delo Group employees and other Associates shall refrain from any conduct that could be interpreted by others as the willingness to commit or participate in Corrupt Practices for or on behalf of Delo Group.

Delo Group emphasizes that it shall not tolerate any Corrupt Practices, including Conflicts of Interest, whether in relation to government officials, public institutions, private companies, politicians or others, or in relation to employees, through abuse of office for the purpose of obtaining personal benefit of any kind.

Regular assessment of corruption risks

6.4. Due to the constantly changing economic, sectoral, legal and operational environment, corruption risks shall be identified and assessed on a regular basis in accordance with the internal regulations of Delo MC and its controlled companies. In assessing corruption risks, all available information relevant to corruption risks, from both internal and external sources, shall be analyzed.

The purpose of the corruption risk assessment is to identify corruption-prone functions in the performance of which Delo Group employees are most likely to engage in Corrupt Practices, either for personal gain or for the benefit of Delo Group. Such corruption-prone functions shall be listed in the relevant internal regulations of Delo MC and its controlled companies. The information on the identified risks shall form the basis for the development of new and the review of existing Anti-Corruption procedures, for mapping the corruption risks, for drawing up a list of positions exposed to corruption risks, and for developing a set of measures to eliminate or mitigate the corruption risks.

List of positions exposed to corruption risks

6.5. Positions exposed to corruption risks shall be identified by taking into account the list of corruption-prone functions, a high degree of autonomy in decision-making due to the specific nature of the official position, and the frequency of interaction with third parties. Such positions exposed to corruption risks shall be listed in the relevant internal regulations of Delo MC and its controlled companies.

Persons holding such positions may not engage in work activities with employees of Delo Group who are their close relatives or in-laws, if such work activities are connected with direct subordination or accountability of one of the above-mentioned persons to another. Persons holding positions exposed to corruption risks shall submit annual Conflict of Interest statements.

Identifying and resolving Conflicts of Interest

6.6. Timely identification of Conflicts of Interest in the activities of Delo Group employees is a key element of the Group's Anti-Corruption efforts.

6.7. The following situations, among others, may give rise to a Conflict of Interest between Delo Group companies and their employees:

6.7.1. Holding an office in another company.

Delo Group is of the opinion that an employee holding an office in another company, in particular in a company that is a competitor, customer, partner, consultant or investor of Delo Group, may be faced with a Conflict of Interest that may have negative consequences for Delo Group.

6.7.2. Abusing official position for personal benefit.

In performing their official duties, Delo Group employees shall not pursue personal interests or obtain benefits by abusing their official position or using Delo Group's assets for personal gain.

6.7.3. Accepting valuable gifts, favors or other rewards that are intended to induce or influence the decisions of a Delo Group employee to the benefit of the giver.

Delo Group considers it unacceptable for its employee to accept gifts, favors or other rewards from Delo Group's competitors, customers, partners, consultants, investors or from representatives of other legal entities and/or individuals, that are intended to influence the employee's judgment so that he/she makes a decision for the benefit of a third party and contrary to the best interests of Delo Group.

6.7.4. Holding (acquiring) securities, shares, units or other interests by a Delo Group employee, his/her family members, relatives and other persons who are associated with the employee through property, corporate or other relationships, in respect of whom it has been established that they are acting under the control and/or for the benefit of such employee of Delo Group (and not for their own benefit) as a result of an agreement reached with the employee in any form, in a company that is a competitor, customer, partner, consultant or investor of Delo Group, other than:

- holding shares in a public joint stock company, representing no more than five (5) percent of the total number of voting shares in such public joint stock company and not enabling the holder to exercise significant influence over the management process and/or decisions of such public joint stock company;
- holding bonds issued by a public joint stock company for an amount that does not enable the holder to exercise significant influence over the management process and/or decisions of such public joint stock company.

6.7.5. Involvement of a family member (spouse, children, including adopted children, siblings, parents and adoptive parents) of a Delo Group employee in a company that is a competitor, customer, partner, consultant or investor of Delo Group.

Delo Group is of the opinion that the involvement of an employee's family member in a company that is a competitor, customer, partner, consultant or investor of Delo Group may impair such employee's impartiality when making decisions in the best interests of Delo Group.

6.7.6. Personal involvement of a Delo Group employee with an employee or representative of a company that is a competitor, customer, business partner, consultant or investor of Delo Group.

Delo Group is of the opinion that its employee may have or develop personal relationships with an employee or representative of a company that is a competitor, customer, partner, consultant or investor of Delo Group, which may compromise the impartiality and neutrality of the Delo Group employee when making decisions in the best interests of Delo Group.

6.8. The procedure for identifying and resolving Conflicts of Interest that employees may encounter in the performance of their duties shall be set forth in the relevant internal regulations of Delo MC and its controlled companies.

Exchange of business courtesies

6.9. Delo Group believes that exchanging business courtesies and incurring entertainment expenses are a necessary part of doing business and are generally accepted business practices. Delo Group encourages an atmosphere of honesty and transparency regarding business courtesies and entertainment expenses. However, Delo Group recognizes that this area is exposed to the risk of Corrupt Practices, and, therefore, all business courtesies that employees may provide on behalf of Delo Group to other individuals and entities, or receive from other individuals and entities in connection with their involvement with Delo Group, must meet all of the following criteria:

- a business courtesy must be directly related to Delo Group's legitimate business activities (e.g., presentation or completion of a business project, successful completion of a contract) or to a commonly celebrated holiday, such as Christmas, New Year, International Women's Day or anniversary;
- a business courtesy must be reasonable;
- a business courtesy must not be a disguised reward for a favor, action, omission, connivance, support, authorization, decision, etc., or an attempt to influence the recipient for any other improper or unethical purpose;
- a business courtesy must not create a reputational risk for Delo Group, its employees or others if information about the courtesy is disclosed;
- a business courtesy must not conflict with the principles and requirements set out in this Policy, other internal regulations of Delo Group companies and applicable Anti-Corruption laws.

If a business courtesy that an employee may receive or has received from another individual or entity in connection with the employee's involvement in Delo Group does not meet all of the above criteria, or if the employee is in doubt as to whether he/she can accept a business courtesy due to the circumstances in which the courtesy was received or due to the perceived value of the courtesy, which is obviously higher than the value of customary business courtesies received in

similar circumstances, he/she must report the courtesy to his/her immediate supervisor or to the structural subdivision / officer responsible for the implementation of Anti-Fraud measures.

6.10. No business courtesies on behalf of Delo Group may be in the form of money (cash or non-cash) in any currency.

6.11. The procedure for arranging and paying for business courtesies in Delo Group, the spending limits for business courtesies, and the list of officers authorized to provide business courtesies shall be set forth in the relevant internal regulations of Delo MC and its controlled companies.

Procurement activities

6.12. In conducting procurement activities, Delo Group companies shall be guided by the laws of the Russian Federation. The organization and procedure for carrying out procurement activities in the companies controlled by Delo MC may be regulated by their respective internal regulations (procurement regulations).

Delo Group companies shall ensure information transparency when publishing information on the procurement of goods, works and services for their needs.

Delo Group companies shall promote free and fair competition for all bidders and participants involved in the procurement of goods, works and services for such companies' needs.

Delo Group companies shall ensure that all qualified legal entities, regardless of their legal form, form of ownership, location, or origin of capital, and all qualified individuals, including individual entrepreneurs, have equal access to procurement procedures.

When organizing procurement procedures for the procurement of goods, works and services for their needs, Delo Group companies shall establish such qualification criteria for bids as to exclude any discrimination against bidders and to ensure that bidders and winners are selected in an impartial manner.

Delo Group does not permit the establishment and use of conditions or methods in its procurement procedures that restrict free competition between bidders and participants more than the applicable law allows.

Philanthropic activities

6.13. Delo Group's philanthropic activities shall be carried out in accordance with Delo MC's internal regulation on the adoption and implementation of decisions on the provision of philanthropic support by Delo MC and its controlled companies.

Relationships with other Delo Group companies

6.14. Controlled companies of Delo MC shall adopt their own Anti-Fraud and Anti-Corruption policies similar to this Policy.

Dealings with Officials

6.15. Delo Group employees shall refrain from any improper or unethical conduct in their dealings with Officials exercising oversight and supervisory functions.

6.16. Delo Group shall not cover any expenses incurred by or on behalf of any Official or his/her close relatives, including the cost of transportation, lodging, meals, entertainment, advertising, or any other benefit at Delo Group's expense, for the purpose of obtaining a commercial advantage in connection with a particular Delo Group project.

Dealings with customers, business partners and Counterparties

6.17. In its business activities, Delo Group adheres to the principles of business ethics and mutually beneficial cooperation and declares that it is not necessary for Delo Group employees to give gifts, make favors or arrange entertainment in order to establish business relationships with third parties.

6.18. Delo Group shall ensure that due diligence procedures are in place with regard to its customers, business partners and Counterparties in order to mitigate and prevent the risk of Delo Group employees being engaged in Corrupt Practices.

Delo Group shall investigate its customers, business partners and Counterparties with regard to their tolerance for corruption, including whether they have their own anti-corruption procedures and policies, and shall check through official sources whether they are trustworthy, whether they have any connections with government Officials (through close relatives or otherwise on the basis of Personal Interest), government agencies and organizations.

Accounting and reporting

6.19. All financial transactions at Delo MC and its controlled companies shall be accurately, correctly and in sufficient detail reflected in the accounting books and records, properly documented and available for review.

Misrepresentation or falsification of primary accounting documents, financial transactions, accounting books and records shall be strictly prohibited.

6.20. Delo Group companies shall appoint officers who shall be personally responsible for the preparation and presentation of complete and accurate financial statements within the time limits established by the laws of the Russian Federation.

Employee awareness and training

6.21. Delo Group shall take reasonable measures to raise awareness of and explain the principles and provisions of Anti-Corruption laws, this Policy and other internal Anti-Fraud regulations of Delo Group companies.

6.22. Delo MC shall publish this Policy on its official website at www.delo-group.ru (the "official website") so that it is readily accessible.

The provisions of this Policy shall be communicated to all employees of Delo MC and to the single-person executive bodies of the companies controlled by Delo MC against their signed acknowledgement.

The content of other internal Anti-Fraud regulations shall be communicated to persons holding positions exposed to corruption risks and to all such other persons as may be specified in such internal regulations.

6.23. Information may be communicated to employees through e-mail newsletters, internal regulations, e-mail reports addressed to designated groups of managers and employees of Delo MC and its controlled companies.

Information, explanations about the importance of this Policy, and consultations on the application of (compliance with) the Anti-Corruption standards and procedures shall also be provided orally to employees by their immediate supervisors and by the employees of the structural subdivision / officer responsible for the implementation of Anti-Fraud measures at Delo MC and its controlled companies.

6.24. Delo Group believes that it is necessary to provide employees with basic Anti-Fraud and Anti-Corruption training, as needed, in order to achieve an appropriate level of Anti-Corruption culture and to maintain an appropriate level of awareness. Training shall be conducted in accordance with the Anti-Fraud laws of the Russian Federation and the internal Anti-Fraud regulations of Delo MC and its controlled companies, including the Code of Business Conduct and this Policy.

6.25. In order to effectively communicate and explain the provisions of this Policy, Delo MC and its controlled companies, using best practices that take into account the preferred use of digital communication and workflow channels by all stakeholders, shall organize educational programs and training sessions and create a visualized version of (redesign) this Policy to promote employee awareness of and motivation to comply with this Policy. The visualized (redesigned) versions of this Policy developed by Delo MC and its controlled companies shall be approved by the authorized governing bodies of the respective companies and shall be published on the official websites of the respective companies.

Reporting Corporate Fraud and improper business practices

7.1. A Hotline has been established to report potential instances of Corporate Fraud and improper business practices at Delo MC and its controlled companies, through which any employee or other person may conveniently report instances of Corporate Fraud, including Corrupt Practices, theft, Conflict of Interest, unfair competition, violation of business ethics and other potential violations that have come to his/her attention.

The purpose of the Hotline is to improve corporate governance and to promptly identify and respond to any potential instances of Corporate Fraud or any other improper business practices at Delo Group companies.

7.2. Concerns about suspected instances of Corporate Fraud may be reported through any of the following channels:

- via a feedback form on the official website of Delo MC or the relevant employer;
- via e-mail at KNGritsay@delo-group.com;
- via the security service of Delo MC or the relevant employer;
- via the immediate supervisor or, in the case of suspected Corrupt Practices by the immediate supervisor, via the immediate supervisor's supervisor;
- via any other available means that are not inconsistent with the laws of the Russian Federation and internal regulations.

7.3. Delo Group shall verify such reports in the manner prescribed by the relevant internal regulations of Delo MC and its controlled companies.

If the reported instance of Corporate Fraud is confirmed, action will be taken to eliminate the causes of the violation, mitigate its consequences and sanction the responsible employees.

When investigating violations that may constitute a corruption offense, Delo Group companies shall cooperate with law enforcement agencies responsible for enforcing Anti-Corruption laws, in accordance with the laws of the Russian Federation.

7.4. To the maximum extent permitted by this Policy, Delo Group guarantees the confidentiality of any employee or third party who has reported a suspected instance of Corporate Fraud or improper business practices. Any such report may be made anonymously at the discretion of the whistleblower.

7.5. Significant instances of Corporate Fraud committed by Delo Group employees shall be reported to the governing bodies of Delo MC.

8. Liability

8.1. Delo Group employees, regardless of their position, shall be held liable for any failure to comply with this Policy.

8.2. Delo Group shall make all reasonable and lawful efforts to sanction and combat Corporate Fraud as promptly and unavoidably as possible.

8.3. For engaging in Corrupt Practices that constitute an administrative or criminal offense, Delo Group employees shall be held liable in accordance with the laws of the Russian Federation.

8.4. For any violation of this Policy, a Delo Group employee may be subjected to disciplinary action at the discretion of his/her employer in accordance with such employer's internal regulation on disciplinary action. Such violations shall include:

- engaging in Corrupt Practices, provided that such conduct does not constitute an administrative or criminal offense;
- failure to comply with the restrictions established by this Policy, the Code of Business Conduct or other internal Anti-Fraud and Anti-Corruption regulations of Delo Group companies;
- non-reporting or concealing an instance of Corporate Fraud;
- non-reporting a Conflict of Interest;
- failure to implement Anti-Fraud and Anti-Corruption measures;
- any other actions/omissions that indicate or contribute to Corporate Fraud.

9. Policy Updates

9.1. Delo MC shall update its Anti-Fraud and Anti-Corruption policies and procedures as necessary.

9.2. If any provision of this Policy or any related Delo MC's procedure is found to be ineffective, or if any applicable laws and regulations are changed, Delo MC's management shall organize the development and implementation of an action plan to revise and update this Policy and/or related Anti-Corruption procedures.
