

**APPROVED**

*President of LANIT group F. G. Gens  
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## Compliance policy of LANIT group

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## DECLARATION

1. The provisions of the Compliance policy of LANIT group (hereinafter – the "Policy") apply to all companies and individuals of the LANIT group of companies (hereinafter collectively referred to as "LANIT" or the "company"), including members of the Board of Directors, shareholders and all employees.
2. As one of the leaders of the Russian IT industry, LANIT implements high standards of business ethics, focusing on legislation and best international practices. Non-compliance with the standards can lead to negative consequences, including legal ones, for any of the employees of LANIT, as well as for the whole company.
3. All employees of LANIT are required to know the principles set out in the Policy and strictly follow them in their work, to pass timely training related to compliance with the Policy, as well as to study the updates and changes made to the Policy. Managers of all levels need to do everything possible to ensure that employees in their departments understand and comply with the Policy in their work.
4. LANIT expects its contractors, consultants, and other people and companies with whom LANIT interacts or who act on behalf of LANIT to follow the principles of business conduct and corporate ethics described in this Policy. Should the contractor fails to comply with these principles any business relationship may be terminated at LANIT discretion.
5. The LANIT Compliance Committee makes changes to the Policy if necessary. Such changes become mandatory for employees after their approval by the Compliance Committee from the moment they are published on LANIT's external and/or internal resources: <https://lanit.ru/about/compliance-policy/> and <https://mylanit.ru/compliance-policy/>.

## 1. COMPLIANCE WITH LEGISLATION

### 1.1. GENERAL PROVISIONS

It is the responsibility of every LANIT official and employee to know and comply with the requirements of Russian and international legislation and other applicable regulations.

When working with foreign contractors or on the territory of a foreign country, you should also take into account the provisions of applicable legislation: some regulations of other countries (for example, the anti-corruption legislation of the United States, in particular, Foreign Corrupt Practices Act 1977) have extraterritorial effect and may apply to companies and individuals who are not American residents/citizens.

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In case any doubts regarding the correct interpretation of the applicable rules arise, the LANIT employee must contact any of the lawyers of the Legal Department: [legal\\_contracts@lanit.ru](mailto:legal_contracts@lanit.ru) or the Compliance Committee members: [compliance@lanit.ru](mailto:compliance@lanit.ru).

Every LANIT employee should know that any form of bribery is prohibited, including commercial bribery and other types of illegal payments for the purpose of obtaining or maintaining a business privilege, speeding up bureaucratic procedures, or obtaining other benefits or assistance. Local customs or common practices cannot be used as a justification for committing a crime.

LANIT employees should not offer or transfer valuable gifts, money, or services to anyone, and government employees especially should not be reimbursed for travel, accommodation, food, or other expenses in order to obtain or maintain a business advantage or favorable attitude. A direct or indirect promise of a bribe is equivalent to giving a bribe. LANIT employees should also not accept bribes or other illegal or inappropriate payments, valuable gifts, services, or compensation.

The detailed anti-corruption requirements, as well as the order of giving gifts, making donations and conducting charity events are set out in the "Anti-bribery and anti-corruption policy of LANIT group", published on LANIT's external and internal resources: <https://lanit.ru/about/compliance-policy/> and <https://mylanit.ru/compliance-policy/>.

## **1.2. AUDIT AND REPORTING**

LANIT and its employees must keep complete and accurate records of all aspects of their activities. Responsible persons must keep accurate, complete and timely records of the movement of funds, property, debts, income, expenses and transactions. Any misrepresentation of records and reports, as well as any hidden information that actually needs to be recorded, is strictly prohibited and may result in dismissal.

All LANIT employees who carry out accounting activities and record keeping are required to ensure proper storage of documents in accordance with internal regulations and procedures.

Internal monitoring of the company's processes and monitoring of compliance with requirements and procedures is carried out by authorized employees of the Finance Service and Legal Department of LANIT, as well as by the Compliance Committee within their competence.

External auditors can be engaged both to evaluate part of an internal process and to review the internal control system in LANIT as a whole. If you have received any information request from an internal controller or auditor, you must provide complete and accurate information without

any misrepresentations or manipulations. If you are not sure what information can be provided please contact a lawyer of the Legal Department.

### 1.3. SANCTIONS

LANIT cooperates with a large number of foreign partners, thus LANIT employees must take into account certain trade and economic restrictions, in particular, sanctions imposed by the Office of Foreign Assets Control (OFAC) of the US Treasury Department, the EU (European Union) and its member states, including the following:

- asset freezes and travel bans for certain individuals on the sanctions lists, as well as a ban on any transactions with such individuals, including through intermediaries;
- ban on medium-and long-term transactions in the capital markets, including transactions with debt and equity instruments in a number of Russian economic sectors (including the provision of advance or deferred payment), including specific Russian companies in the financial, defense and energy sectors;
- ban on the provision of certain goods, services and technologies to certain segments of the Russian economic sector;
- prohibition of investment, export and import of any goods, services or technologies to and from Crimea (directly or indirectly) and others.

All these measures create a number of compliance problems for American and European companies working with LANIT in Russia, and require additional control, since they may lead not only to the termination of cooperation with key foreign contractors of LANIT, but also may entail significant financial consequences in the form of fines, compensation for damages, significant legal costs, as well as the inclusion of the company itself in the sanctions lists, which in principle can completely paralyze the company's business.

The risks associated with compliance with the sanctions restrictions are assessed in accordance with the General procedure in accordance with the "Compliance risks regulations of LANIT group", published on LANIT's internal resource: <https://mylanit.ru/compliance-policy/> (section "Compliance check"). The Compliance officer is responsible for conducting the compliance check. The company provides appropriate training for the responsible person, as well as the availability of the necessary resources for verification.

The Compliance officer also performs periodic risk assessments to identify new sanctions risks and adapt the company's policies and procedures to changing risks.

## 2. CONTRACTORS AND PARTNERS

### 2.1. CONTRACTORS DUE DILIGENCE

To minimize possible risks when dealing with partners and contractors each new contractor and, if required by the internal procedures, the existing ones, shall be obligatory checked in accordance with the "Contractors due diligence regulations of LANIT group", published on LANIT's internal resource: <https://mylanit.ru/compliance-policy/>.

When making a decision on the possibility of working with a partner, compliance risk factors should always be analyzed and assessed in accordance with the "Compliance risks regulations of LANIT group" (published on LANIT's internal resource: <https://mylanit.ru/compliance-policy/>, see section 4.2 of the Policy for more information).

We expect that all suppliers, contractors, consultants and other partners who have passed the due diligence and compliance risk assessment procedures and successfully work with or on behalf of LANIT will adhere to the following principles during our cooperation:

- Comply with applicable laws and other regulations, including sanctions restrictions, if applicable.
- Do not offer, extort or accept bribes, valuable gifts, or anything else that affects the impartiality of decision-making when interacting with LANIT employees, as well as when interacting with other legal entities or individuals within the framework of cooperation with LANIT.
- Conduct transparent and accurate reporting and data accounting.
- Confidential information available to the contractor when dealing with LANIT can only be used by the contractor within the framework of contractual relations.
- Avoid conflicts of interest when making decisions in the framework of cooperation with LANIT.
- Report violations of the listed principles in accordance with the Policy (see section 4.3 of the Policy for details).

Failure by the contractor to comply with the indicated principles may lead to termination of any business relationship with such contractor.

### 2.2. DEALS

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LANIT has internal procedures that regulate the access of certain employees to funds, as well as giving some of them the right to sign contracts on behalf of the company. The process of issuing of PoAs is controlled by the lawyers of Legal Department.

We expect all employees who are authorized to sign contracts and manage any amounts from the company's funds to be attentive and reasonable in their approach to expenses. If you sign a contract or any other document issued by the company, make sure that:

- you have the authority to sign such a document;
- you understand and agree with everything set out in the document you sign;
- the document was approved by the responsible manager, lawyer of the Legal Department and Finance Service;
- you have no doubts about the partner's integrity;
- partner signatory's authorities are verified.

After signing the documents, the responsible manager monitors the execution of the deal by both LANIT and the contractor, including the following points:

- fulfillment of all obligations under the agreement in time;
- duly payment processing;
- preparation and storage of closing documents confirming the proper and timely performance of the parties' obligations.

### **2.3. ANTI-BRIBERY AND ANTI-CORRUPTION**

As stated in clause 1.1 of the Policy, LANIT prohibits both its employees and employees of contractors from taking any form of bribes. Detailed requirements of LANIT in the field of anti-corruption, as well as the basic rules of giving gifts, making donations and charity conducting are set out in the " Anti-bribery and anti-corruption policy of LANIT group".

The company's employees should follow anti-corruption principles in their activities and especially in settlements with contractors:

- reflect the actual economic conditions of the transaction as accurately as possible in the agreement;
- do not allow unjustified advance payments: any payments in favor of contractors in the absence of documented relationships are not made as a general rule, but in exceptional cases are made on the direct instructions of the Financial Director of the group of companies;
- monitor the execution of the agreement in accordance with clause 2.2 of the Policy;

- properly store all contractual and closing documents, business correspondence and relevant approvals;
- include a reference to this Policy in contracts with contractors as well as anti-corruption wording suggested by the Legal Department.

### **3. WORK IN LANIT**

#### **3.1. WORK RELATIONSHIP**

LANIT provides equal employment opportunities for all qualified candidates and employees. LANIT does not discriminate on the basis of age, origin, skin color, any family reason leave or sick leave, gender identity or expression, genetic information, marital status, medical condition, national origin, disability, political affiliation, race, religion, gender (including pregnancy), sexual orientation, or other characteristics protected by applicable laws, rules and regulations and not related to the professional qualities of a person and the performance of official duties.

Exactly the same principles should guide LANIT employees in their professional communication. No attacks or rude jokes related to gender, age, nationality, political or religious views, or other named characteristics are allowed. Any kind of violence, harassment, or threats is also unacceptable.

#### **3.2. COMPANY PROPERTY**

LANIT provides employees with all the resources they need to work and expects them to take care of this property. The use of property for personal purposes (all not related to work activities), is NOT allowed.

All employees respect each other and the work of staff who maintain cleaning and order in their offices.

#### **3.3. CONFLICT OF INTEREST**

A conflict of interest is a situation where there is (or may arise) a conflict between the personal interests of an employee of the company (or the interests of his friends, relatives, partners) and the interests of LANIT. If we do not identify possible conflicts of interest in time, such situations can affect decisions, undermine trust within the team and damage the company's reputation.

The following are examples of situations in which there is or may theoretically be a conflict of interest:

- close personal relationship that goes beyond a business relationship between a LANIT employee on the one hand and LANIT contractors on the other;
- close relationship between a supervisor and a subordinate;
- use by LANIT employees of their official powers for the purpose of personal gain or personal enrichment that contradicts LANIT's interests;
- simultaneous employment in LANIT and in another company, including a competitor, or in a company that is a contractor/consultant of LANIT;
- employee has an equity interest in a company that competes with LANIT or is a supplier or client of LANIT;
- presence of personal financial interests in the transaction that you make on behalf of LANIT that can influence your decisions.

Employees who believe that they may be involved in a conflict of interest should notify their direct chief for advice on the situation and/or report a potential conflict of interest to the compliance hotline: [compliance@lanit.ru](mailto:compliance@lanit.ru). If manager of any level receives information from an employee about a potential conflict of interest he must inform one of the members of the Compliance Committee or report to the compliance hotline: [compliance@lanit.ru](mailto:compliance@lanit.ru).

Each employee is required to take a timely (at least once a year) survey on conflicts of interest, which is conducted by the company on a regular basis.

#### **3.4. CONFIDENTIAL INFORMATION**

LANIT operates a large amount of confidential information, both our own data and the data of our partners. Disclosure of such information is prohibited, because it can cause significant harm to the company and lead to the loss of trust to LANIT. When applying for employment, all employees sign a non-disclosure agreement and agree to comply with the regulations on the trade secrets protection approved by the specific company of the group.

Even if an employee does not have access to any confidential information due to his official duties, it is quite difficult not to find out anything secret when working at LANIT. Confidential information can be obtained, for example, from conversations of your colleagues or from the documents left in the printer or on the table. In all such situations, each employee should remember that they have an obligation not to disclose any confidential information (even to colleagues if they do not have access to such information) and to use confidential information only for the performance of their official duties.

In order to save confidential information, all employees must follow the rules:

- It is forbidden to store documents on your desktop (any contracts, acts, invoices, correspondence, personal records regarding projects). If such documents are discovered



by a security officer, they can be withdrawn and returned to the owner only after providing an explanation from your supervisor.

- Lock your computer whenever you leave your workplace.
- Do not store confidential information on portable devices if you have not provided them with sufficient security (not on the table or in open cupboards). They can also be removed by a security officer and returned to the owner only after providing an explanation from your supervisor.
- Make sure that confidential information displayed on your laptop monitor is not visible to unauthorized persons (especially outside the office, in public places).
- Never throw ANY documents in the trash. They should always be destroyed in the shredder.
- Do not discuss confidential information in public places where it can be heard by outsiders.

All employees should be very careful when answering third parties questions about LANIT, both in official communication with contractors or the media, and in informal: in social networks, when meeting friends outside the company. When talking about LANIT, the employee should follow common sense, recommendations of the Marketing Service, as well as regulations on working with information that forms a trade secret. If your friends or close relatives work for competing companies, you should be especially careful when communicating with them on professional topics.

Employees are prohibited from making any official statements on behalf of the company without the appropriate authority or permission. Media requests are sent to the company's management or to the PR Department at [pressa@lanit.ru](mailto:pressa@lanit.ru). More information about the Department's work can be found on LANIT's external website <https://www.lanit.ru/press/> and in the "Marketing" section on the internal site <https://mylanit.ru/marketing/>, where employees are provided with up-to-date information regarding the procedures of approving PR materials, regulations regarding LANIT brand symbols use, advice on preparation of advertising materials, etc.

When negotiating with potential partners, a LANIT employee may have a need to pass the partner some confidential information before signing a contract. This can only be done by signing a non-disclosure agreement (NDA). Before passing the confidential information, you must make sure that such an agreement is actually signed. If you have any questions about the NDA, contact a lawyer of the Legal Department.

Communication with representatives of state and municipal authorities on behalf of LANIT (if the authority does not act as a counterparty) is only possible if the employee is authorized to do so. When communicating with government (and municipal) employees, you can only declare the official position of the company, which is available to third parties in open sources.

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### **3.5. SOCIAL RESPONSIBILITY**

More than ten thousand employees work for LANIT. The company is aware of its social responsibility, participates in charity activities, and on a voluntary basis attracts employees to participate in charity events to help socially vulnerable people, people with disabilities and orphans.

The company's management and employees support different initiatives inside the office in order to reduce the industrial impact on the environment: separate waste disposal, energy efficiency, switching to electronic document management and reducing paper consumption when printing documents.

Find more information about projects and events at <https://lanit.ru/social/>.

### **3.6. TRAINING**

Each LANIT employee must complete mandatory compliance training, and all managers and other employees who are authorized to make decisions on commercial issues, in addition to compliance training, must complete an anti-corruption training (or other event organized by the company).

Compliance and anti-corruption trainings are conducted by the company twice a year for all employees, and for new employees – no later than the day of expiration of the probationary period (if any) or during the first 3 (three) months of the employee's work in the Company.

In addition, the Company informs employees about the compliance innovations, changes in the policies both in writing and by email, as well as by publishing the information and updates on the internal LANIT resource.

Compliance training, anti-corruption training and other related activities are developed and conducted by the Compliance Committee in conjunction with the HR department.

## **4. COMPLIANCE COMMITTEE**

### **4.1. COMPETENCE**

In order to maintain compliance with Russian and international standards and practices and prevent unacceptable and unethical actions, violations of the principles and requirements of the Policy, LANIT has established a Compliance Committee, whose members are approved by the final beneficiary of the LANIT group of companies (The President of the LANIT group). The current

structure of the Compliance Committee is posted on LANIT's internal resource: <https://mylanit.ru/compliance-policy/>.

The competence of the Compliance Committee includes:

- development and approval of internal documents and regulations on compliance issues;
- development of a schedule of compliance activities for the upcoming year;
- coordination of compliance risks;
- review of requests sent to the compliance hotline, perform the required actions and take the necessary measures to resolve the substance of the received request;
- resolution of current compliance issues and coordination of compliance risks in accordance with the approved "Compliance risks regulations of LANIT group".

The Compliance Committee must include: the Financial Director, the Director of the Legal Department, the Head of PR Department, persons acting as the executive bodies of the main companies of the group, as well as a compliance officer who reports directly to the final beneficiary (the President of LANIT group).

#### **4.2. APPROVING COMPLIANCE RISKS**

The Compliance Committee develops and approves the "Compliance risks regulations of LANIT group" and publishes it on LANIT's internal resource: <https://mylanit.ru/compliance-policy/>, and also makes changes to it as necessary and brings such changes to the attention of LANIT employees.

The regulation defines the direct procedure for approving compliance risks and responsible persons, as well as defines specific factors that contain compliance risks. All LANIT employees involved in working with contractors and the contract approval process, including employees of the Legal Department and Financial Service, as well as managers at any level, individual lawyers and financial directors of companies, and managers working with contractors directly must know and recognize such factors and involve the Compliance Committee if any factor is identified in order to assess potential compliance risks.

#### **4.3. HOTLINE**

If any questions, doubts, difficulties, problems or conflicts arise related to any of the issues described in this Policy, each employee must perform any (or all) of the following actions:

- contact a lawyer of the Legal Department or Financial Service;
- report the problem to your direct or superior chief;

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- write an email to the compliance hotline [compliance@lanit.ru](mailto:compliance@lanit.ru);
- send an anonymous message using the feedback form here: <https://lanit.ru/about/compliance-policy/>;
- to contact any of the members of the Compliance Committee, compliance officer.

#### **4.4. INTERNAL INVESTIGATIONS**

When conducting an internal investigation on compliance issues, each employee of the company undertakes to provide all necessary assistance in conducting an internal investigation to members of the Compliance Committee or their authorized persons, and to provide all necessary information and documents. Failure to provide assistance, refuse to provide information and documents, or conceal information and documents is strictly prohibited and may result in dismissal.

Every employee should be aware that a request via the feedback form can be made completely anonymously at the request of the employee.

Any form of harassment, reprisals, or other negative consequences against an employee who has faithfully reported a possible violation of this Policy or is involved in an internal investigation is strictly prohibited in LANIT.

## 5. REGULATIONS

- 1) Universal Declaration of Human Rights (UDHR)
- 2) United Nations Convention against Corruption (UNCAC)
- 3) Criminal Law Convention on Corruption
- 4) OECD Anti-Bribery Convention
- 5) UK Bribery Act 2010 (Закон Великобритании «О взяточничестве»)
- 6) Foreign Corrupt Practices Act 1977 (FCPA)
- 7) Corruption of Foreign Public Officials Act, Canada (CFPOA)
- 8) International Labour Organization Declaration on Fundamental Principles and Rights at Work (1998)
- 9) Rio Declaration on Environment and Development
- 10) Constitution of the Russian Federation
- 11) Criminal code of the Russian Federation
- 12) Code of the Russian Federation on administrative violations
- 13) Civil code of the Russian Federation
- 14) Labor code of the Russian Federation
- 15) Federal law «On anti-corruption»
- 16) Federal law «On countering the legalization (laundering) of proceeds from crime and the financing of terrorism»
- 17) Federal law «On the civil service system of the Russian Federation»
- 18) Federal law «On the state civil service of the Russian Federation»
- 19) Federal law «On municipal service in the Russian Federation»
- 20) Methodological recommendations for the development and adoption by organizations of measures to prevent and combat corruption