

APPROVED BY

Resolution of the Board of Directors
PJSC TransContainer
05.07.2021 (Minutes No. 5)

(Annex No. 2 to the Minutes)

Chairman of the Board of Directors

_____ S.N. Shishkarev

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ANTI-FRAUD AND CORRUPTION POLICY OF PJSC TRANSCONTAINER

Moscow Region, Khimki
2021

1. General Provisions

1.1 The Anti-bribery and Corporate Fraud Policy of PJSC TransContainer (hereinafter referred to as the “Policy”) is a by-law of Public Joint Stock Company Center for Cargo Container Traffic TransContainer (hereinafter referred to as “TransContainer”), a member of the Delo Group, which defines key requirements in the field of combating corporate fraud, bribery and corruption.

The Delo Group, being the largest transport and logistics holding company in Russia, pursues the policy of zero tolerance to any forms and manifestations of corporate fraud and corruption: bribery, abuse of power or authority, any forms of corrupt business practices and other illegal actions resulting in formation of personal interest which may be classified as “corporate fraud” under this Policy.

1.2. The Policy is drawn up in accordance with the Federal Law “On Countering Corruption”, Methodological Recommendations on Development and Adoption of Organizational Measures to Prevent and Counteract Corruption developed by the Ministry of Labor and Social Protection of the Russian Federation, other regulations on combating corporate fraud, bribery and corruption, as well as the Articles of Association of TransContainer. The Policy is drawn up in furtherance of the Code of Conduct of PJSC TransContainer.

1.3. The following **basic terms and concepts** are used in the Policy:

“**Associated Parties**” means managers, employees of TransContainer and other persons acting on behalf or for the benefit of TransContainer, directly or indirectly, in person or through any intermediary.

“**Bribe**” means, according to Articles 290 and 291 of the Criminal Code of the Russian Federation, giving and receiving money, securities, other property by an officer, foreign officer or an officer of a public international organization, in person or through an intermediary, or in the form of unlawful provision of property services, granting of other property rights for the performance of acts (omissions) in favor of a briber or persons he/she represents, if such acts (omissions) fall within the officer’s official powers or if the officer may, due to its official capacity, facilitate such acts (omissions), as well as for the general protection or connivance.

“**Hot Line**” means communication channels for receiving messages containing allegations, information on cases of corporate fraud, corruption, conflict of interest, unfair competition, violations of business ethics and other possible violations.

“**Abuse of Powers**” means, according to Article 201 of the Criminal Code of the Russian Federation, use by a person performing the managerial functions in a commercial or another organization of his/her powers contrary to the legitimate interests of such organization and for the purpose of gaining benefits and advantages for him/herself or for other persons, or causing damage to other persons.

“**Officials**” means any persons who perform functions of a public authority representative or perform organizational and administrative, administrative and business functions: in state bodies, local government bodies, state and municipal institutions, state extra-budgetary funds, public corporations, state-owned companies, public not-for-profit organizations, state and municipal unitary enterprises, business companies covered by the right to dispose of more than fifty percent of the its votes, directly or indirectly (through any controlled persons), granted to the Russian Federation, any constituent entity of the Russian Federation or a municipal unit, or covered by the right to appoint (elect) its sole executive body and/or over fifty percent of members of its collegiate governing board granted to the Russian Federation, any constituent entity of the Russian Federation or a municipal unit; in joint stock companies which are subject to a special right of participation in administering such companies granted to the Russian Federation, constituent entities of the Russian Federation or municipal units; as well as in the Armed Forces of the Russian Federation, other troops and military force units of the Russian Federation.

“**Personal Interest**” means situation when any TransContainer's employee has an opportunity to receive income in the form of monetary funds, other property, including property rights, property-

related services, results of work performed or any benefits/advantages:

In person

through persons closely related to him/her

through any persons connected with such employee on the basis of the property-related, corporate or other relations when it is established that such persons act under the control and/or for the benefit of such employee of TransContainer (and not for their own benefit) as a result of any arrangement achieved with such employee.

“Corrupt (Business) Practices” means, according to Article 204 of the Criminal Code of the Russian Federation, any illegal transfer of money, securities, other property to a person performing managerial functions in any commercial or other organization, as well as illegal provision of any property-related, or granting of any other property rights to him/her (in particular, when property is transferred or property-related services are provided or property rights are granted to another individual or legal entity at the direction of such person) in return for actions/omissions performed for the benefit of the person providing/granting the above mentioned or for the benefit of any other persons if the specified actions/omissions fall within competence of such person’s employment-related powers, or if such person has an opportunity to facilitate such actions/omissions by virtue of his/her title/position.

“Counterparty” means any Russian or foreign legal entity or individual with whom TransContainer enters into contractual relations, except for the employee-employer relations.

“Conflict of Interest” means situation when personal interest (direct or indirect) of the TransContainer’s employee affects or may affect performance of his/her official duties, when there is or may be a conflict between the personal interest of the TransContainer’s employee and the rights and legitimate interests of TransContainer that may cause damage to the rights and legitimate interests, property and/or business reputation of TransContainer.

“Corporate Fraud” means actions or omissions of individuals and/or legal entities performed for the relevant person’s own benefit and/or for the benefit of another person to the detriment of the interests of TransContainer, and/or preformed to cause pecuniary and/or non-pecuniary damage to TransContainer through deception, breach of trust, misrepresentation or otherwise. Corporate Fraud may take form of misrepresentation of financial statements, corrupt activities, as well as embezzlement and other abuses, including intentional damage, in relation to TransContainer's assets.

“Corruption” means abuse of official position, giving bribe, taking bribe, abuse of powers, corrupt practices or another unlawful use by an individual of his official position contrary to the legitimate interests of a company and the State for the purpose of obtaining benefit in the form of money, assets, other property or property services, other property rights for himself or for third parties or unlawful provision of such benefit to the specified person by other individuals. Performance of the above actions on behalf or in the interests of a legal entity shall also be deemed corruption.

“Corporate Fraud Management” means a set of measures implemented to identify, prevent, investigate cases of corporate fraud and eliminate their causes.

“Anti-corruption Management” means activities of the federal government bodies, public authorities of the constituent entities of the Russian Federation, local authorities, civil society institutions, organizations and individuals falling within their competence and performed in order to:

- a) prevent corruption, including detection and subsequent elimination of the causes of corruption (prevention of corruption)
- b) detect, prevent, suppress, reveal and investigate corruption offences (combating corruption)
- c) mitigate and/or eliminate consequences of the corruption offences.

2. Policy Goals and Objectives

2.1. The Policy is drawn up **in order to:**

mitigate the risks of corporate fraud and involvement of the company management and employees (regardless of the position held), members of the governance bodies and representatives of

TransContainer's counterparties in corrupt practices

form a uniform understanding of TransContainer's policy of zero tolerance towards Corporate Fraud, in any of its forms and manifestations, among TransContainer's Associated Parties, investors, business partners and counterparties

establish obligation of the employees and members of the governance bodies of TransContainer to be aware of and observe the key provisions of the anticorruption laws, as well as the TransContainer's bylaws governing Corporate Fraud Management activities.

2.2. The **objectives** of the Policy are as follows:

creating the internal regulatory framework of TransContainer in the field of combating Corporate Fraud and corruption

making the employees of TransContainer and other persons aware of the basic principles and requirements concerning activities of TransContainer and its employees related to compliance with the applicable anti-corruption laws

summarizing and explaining the procedures and measures applied by TransContainer in the area of combating Corporate Fraud and corruption, as well as procedure for implementation thereof

providing information channels for reporting cases of Corporate Fraud

defining powers and responsibility of TransContainer's employees in relation to the issues connected with combating Corporate Fraud.

3. Policy Principles

TransContainer's Policy is based on the following principles:

3.1. Compliance with the laws and generally accepted rules

The measures implemented by TransContainer to combat Corporate Fraud conform to the Constitution of the Russian Federation, generally accepted principles and rules of the international law and international treaties executed by the Russian Federation, Russian Federation laws, and other regulations applicable to TransContainer, as well as to the customary business practices.

3.2. Adherence to the Single Anti-corruption Policy of the Delo Group

The Policy is drawn up in accordance with the unified principles and methodological approaches to combating Corporate Fraud and corruption adopted by the Delo Group, in particular, for the purpose of ensuring compliance of the holding company employees with the standards of anti-corruption behavior and mitigating the risk of corruption.

3.3. The tone from the top

TransContainer's managers of all levels form the culture of intolerance towards Corporate Fraud through their own example and play a key role in the development of the TransContainer's Corporate Fraud Management system.

3.4. Zero tolerance towards Corporate Fraud

TransContainer shall adhere to the principle of zero tolerance towards Corporate Fraud in all its forms and manifestations in production, investment and other activities.

The specified principle means that the Associated Parties of TransContainer are strictly prohibited from participation (either directly or through third parties) in any forms of corruption and other types of Corporate Fraud regardless of business practices in any particular country.

3.5. Proportionality in terms of risks and effectiveness of anti-corruption procedures

TransContainer shall develop and implement a system of anti-corruption procedures that are reasonable from the point of view of the identified risks. TransContainer shall ensure implementation of the most transparent anti-corruption procedures as part of the business processes exposed to the risk of corruption. TransContainer strives to apply anti-corruption procedures that have low cost, ensure simplicity of implementation and bring meaningful results. Anti-corruption procedures shall be

revised, improved and updated taking into account changes in the external and internal environment.

3.6. Due diligence

TransContainer shall organize due diligence procedures to check counterparties, business partners and applicants with respect to their reliability, zero tolerance to corruption and absence of conflict of interest before making a decision on commencing or continuing business or employment relations, and shall notify the specified persons about the anti-corruption procedures implemented by TransContainer before proceeding to cooperation.

3.7. Engagement of and provision of information to the employees

TransContainer encourages the Associated Parties to report, as soon as possible, on the signs of possible violations of the Policy requirements and the facts indicative of Corporate Fraud, as well as to offer recommendations and measures to improve the Corporate Fraud Management system.

TransContainer employees are made aware of provisions of the anti-corruption laws and actively participate in the development and implementation of the anti-corruption procedures in TransContainer.

3.8. Control and regular monitoring

TransContainer shall carry out regular and current monitoring of effectiveness of the implemented standards and procedures aimed at combating Corporate Fraud counteraction, and shall also supervise implementation thereof pursuant to the procedure provided for in the by-laws of TransContainer.

3.9. Liability and unavailability of punishment

Irrespective of the position held, employment history and other conditions, the employees of TransContainer shall be held liable for failure to comply with the provisions of anticorruption laws and TransContainer's by-laws governing Corporate Fraud Management, and they commit any acts of corruption, they may be held liable at the initiative of TransContainer, law enforcement agencies or other persons pursuant to the procedure and on the grounds stipulated by the applicable laws, by-laws and employment agreements.

3.10. Waiver of retaliatory sanctions

TransContainer declares that no employee will be subject to any sanctions (except in cases of knowingly fraudulent statements) if he or she has reported:

any alleged fact of Corporate Fraud and Corruption, including his/her refusal to bribe, engage in any corrupt practices or act as a mediator in the process of bribery; alleged violations of monitoring procedures and other cases of abuse, in particular when as a result of the above circumstances TransContainer has suffered losses or failed to obtain any commercial and competitive advantages

cases when any TransContainer's employee was induced to commit corruptive actions

violation of the Policy and other TransContainer's by-laws governing Corporate Fraud Management.

4. Policy Scope

4.1. The provisions of the Policy shall apply to all employees of TransContainer who have employee-employer relationship with TransContainer, regardless of the position held and functions performed. The Policy shall also apply to other Associated Parties.

4.2. The anti-corruption procedures of TransContainer may determine conditions under which the Policy applies to the counterparties with which TransContainer has contractual relations.

4.3. The requirements of the Policy shall become binding on the companies where TransContainer acts as a major member (shareholder), as well as on other organizations in which PJSC TransContainer acts as a member (directly or indirectly), after approval thereof by, and making it effective in accordance with the Articles of Association of, such companies.

4.4. In order to effectively inform the specified persons, and explain provisions, of the Policy, TransContainer shall organize educational programs and trainings, as well as development of the visualized version of the Policy ("redesign"), which aim at facilitation of understanding of the Policy

and ensuring employees' compliance with the provisions thereof, being guided by the best practices that take into account that the parties concerned prefer to use digital communication and business interaction channels. The visualized version of the Policy ("redesign") shall be approved by the Management Board of TransContainer and shall be placed on the internal website of TransContainer (Intranet portal).

5. Persons Involved in Policy Implementation

5.1. Effective governance in the area of Corporate Fraud Management shall be achieved through productive and prompt interaction among the following parties:

- Board of Directors;
- Audit Committee of the Company's Board of Directors
- President
- Internal Audit Service
- business unit / official responsible for corruption management activities
- managers at any and all levels
- employees.

5.2 Within the framework of Corporate Fraud Management activities the functional roles shall be allocated among the above-mentioned parties as follows:

5.2.1. Board of Directors:

approve the Anti-bribery and Corporate Fraud Policy, as well as any alterations and supplements thereto

monitor the results of Policy application, and effects of implementation of the anti-corruption procedures by TransContainer.

5.2.2. The Audit Committee of the Company's Board of Directors shall:

maintain control over special audits (investigations) concerning potential cases of Corporate Fraud, corruption, other unfair actions; shall organize control over the effective functioning of the system of notification of potential cases of unfair actions of TransContainer employees and third parties, as well as control over implementation of measures taken by the executive bodies of TransContainer within the scope of such system

perform preliminary review and preparation of recommendations concerning the reserved matters of the Board of Directors related to Corporate Fraud Management in TransContainer.

5.2.3. The President shall be responsible for:

implementation of the Policy at TransContainer

ensuring compliance with requirements of the applicable laws and by-laws of TransContainer governing Corporate Fraud Management

determines the business unit / official responsible for the implementation of Corporate Fraud Management activities in TransContainer, as well as competence of the heads of structural units as regards Corporate Fraud Management.

5.2.4. The Internal Audit Service shall:

perform independent (regular) assessment of the status of the Corporate Fraud Management system, and of conformance of TransContainer's activities to the provisions of the applicable laws and the Policy, and shall draw up relevant recommendations

submit the results of assessment to the Audit Committee of the Company's Board of Directors for consideration

provide assistance to the executive bodies of TransContainer in the process of investigation of the cases of Corporate Fraud and Corruption committed by TransContainer's employees and third parties.

5.2.5. Business unit / official responsible for Corporate Fraud Management activities: shall:

drawn up an anti-bribery and corporate fraud plan, and shall ensure control over implementation thereof

develop anti-corruption procedures, procedure for implementation thereof and control over application of the same

initiate update of TransContainer's by-laws governing Corporate Fraud Management

identify and assess risks of corruption take measures of control aimed at detecting cases of Corporate Fraud activities on the part of TransContainer's employees;

receive, consider and analyze reports concerning inducement of the employees to corrupt acts for the benefit or on behalf of another organization, cases of corruption on the part of TransContainer's employees, counterparties of TransContainer or other persons

organize training on the issues of Corporate Fraud prevention and management, compliance with the applicable anti-corruption laws, individual counseling of the employees, informing on the issues of Corporate Fraud Management

analyze and evaluate the level of Corporate Fraud Management achieved by TransContainer, sufficiency and effectiveness of the system of anti-corruption measures taken by TransContainer; provide the President of TransContainer with proposals on improvement of organization and efficiency of work on prevention of corrupt practices in TransContainer based on the results of such analysis and evaluation

review and verify reliability of the information specified in the declarations on the absence of conflict of interest, and shall perform due diligence of counterparties

run audits and internal investigations into Corporate Fraud and Corruption, establish the reasons for such practices and shall prepare recommendations aimed at elimination of the possibility of corrupt practices in the future

assist authorized representatives of supervisory and law enforcement authorities in carrying out inspections of TransContainer's anti-corruption and anti-bribery activities

cooperate with the law enforcement authorities in the process of suppression or investigation of corruption-related crimes, including the law enforcement intelligence-gathering activities

assess results of the anti-corruption activities implemented by TransContainer and shall draw up relevant reports for the management of TransContainer.

5.2.6. The heads of the business units of TransContainer shall ensure Corporate Fraud Management and anti-corruption activities within their relevant area of responsibility and competence, in particular, they shall:

ensure effective functioning of the internal control system

identify processes and procedures vulnerable to Corporate Fraud acting within their competence

initiate disciplinary actions against employees guilty of or involved in Corporate Fraud and violations of the internal control system together with TransContainer's business units responsible for the HR and legal support of operations

assist in preliminary review or internal investigation of cases of Corporate Fraud and Corruption

assist skilled personnel conducting the preliminary review and/or internal investigation by providing access to the premises, facilities and documents required from the preliminary audit and/or internal investigation activities

inform the business unit / official responsible for Corporate Fraud Management of all signs of Corporate Fraud or attempts to perform relevant actions, acting within their area of responsibility.

5.2.7. TransContainer employees shall:

strictly comply with the applicable laws, principles, requirements and rules established by the Policy and the Code of Conduct of PJSC TransContainer, as well as with other TransContainer's by-laws governing Corporate Fraud Management

perform the duties assumed in connection with implementation of the control procedures and functions related to the Corporate Fraud Management

acting within their authority, participate in the development and implementation of control procedures within the framework of the Corporate Fraud Management

refrain from committing and/or participating in corrupt practices for or on behalf of

TransContainer, as well as from behavior that may be interpreted by others as willingness to commit or participate in any corrupt practices for or on behalf of TransContainer

notify, without delay, their immediate supervisor or a business unit / official responsible for Corporate Fraud Management of cases of inducement to corrupt practices, acts of corruption performed by other employees, counterparties or other persons, of any potential or actual conflict of interest that has become known to them

assist in carrying out audit activities, preliminary inspections and internal investigations, in particular, they shall provide explanations, necessary documents and information acting within the scope of their competence and pursuant to the procedure established by the applicable laws and TransContainer's by-laws.

6. Standards, Lines of Activity and Corporate Fraud Management Activities

Corporate Fraud Management activities

6.1 TransContainer implements Corporate Fraud Management activities in accordance with the local regulations governing activities aimed at combating corporate fraud and corruption, internal control and compliance with the business ethics rules.

Implementation of the standards for behavior of TransContainer's employees

6.2 For the purpose of implementation of the anti-corruption standards for behavior of the employees, TransContainer shall establish general rules and principles of the employees' behavior in terms of business ethics aimed at facilitation of ethical and conscientious behavior of the employees.

Such general rules and principles of conduct are described in the Code of Conduct.

6.3. Employees of TransContainer and other Associated Parties shall also refrain from conduct which may be interpreted by others as willingness to engage in corruption or participate in corrupt practices for the benefit or on behalf of TransContainer.

TransContainer emphasizes inadmissibility of the corrupt practices, including manifestations of conflict of interest, both in relation to the representatives of the state, civil society organizations, private companies, politicians and other third parties, and in relation to TransContainer's employees through abuse of official position in order to obtain any personal benefit.

Regular assessment of risks of corruption.

6.4. Due to constant changes in the economic, industry, legislative and operational environment, the identification and assessment of corruption risks are carried out on an ongoing basis pursuant to the procedure established by the by-laws of TransContainer. When assessing corruption risks, the company analyzes all available information related thereto, both from internal and external sources.

The corruption risks are assessed in order to identify corruption-prone functions, i.e. the functions that are most likely to be corrupted by TransContainer employees both for personal gain and for the benefit of TransContainer. The corruption-prone functions shall be listed in a by-law of TransContainer. Information on the identified risks shall serve as basis for development of the new and analysis of the existing anti-corruption procedures, development of the corruption risk map, drawing up the list of positions associated with high risk of corruption, as well as for development of a set of measures to eliminate or mitigate corruption risks.

List of Positions Exposed to the Corruption Risks

6.5. Positions exposed to the corruption risks shall be determined taking into account the list of corruption-prone functions, as well as a high degree of freedom of decision-making connected with the specific nature of work, and active interaction with third parties. The list of positions associated with corruption risks shall be specified in a relevant by-law of TransContainer.

Persons who hold specified positions shall not engage in labor activities in case of close kinship or in-law relations with the employee of TransContainer when relevant labor activities are connected with direct subordination or accountability of one of the specified persons to another. Persons holding positions associated with the corruption risks shall fill in an annual statement of absence of the conflict

of interest.

Identification and management of conflict of interest

6.6. Timely detection of conflict of interest connected with the activities of the employees of TransContainer represents one of the key elements of anti-corruption measures.

6.7. A conflict of interests of TransContainer and those of its employees may lead to the following situations (among other things):

6.7.1. Holding positions in other companies.

TransContainer proceeds from the fact that holding positions in other companies, in particular those which are deemed a competitor, client, partner, consultant, investor of TransContainer, concurrently with holding position in TransContainer may lead to the conflict of interest and have negative consequences for TransContainer.

6.7.2. Abuse of position to personal advantage.

The TransContainer employees shall not pursue personal interests and gain benefits by abusing their official position, using the TransContainer's property to their personal advantage while performing their official duties.

6.7.3. Receipt of valuable gifts, gratuitous services / work and other types of remuneration aimed at exerting pressure or influence when a TransContainer employee makes a decision for the benefit of the giver.

TransContainer shall not tolerate receipt of any gifts, services, works and other types of remuneration by its employees from the competitors, clients, partners, consultants, investors of TransContainer and other representatives of legal and/or natural persons, presented in order to influence such employees' opinion and obtain decision for the benefit of the third parties, contrary to the interests of TransContainer.

6.7.4. Holding (acquisition) of securities, shares, participation units, or other participation of an employee of TransContainer, his/her family member, his/her relatives, and other persons related to him/her by property-related, corporate or other relations, who, as established, act under the control and/or for the benefit of such employee of TransContainer (rather than for their own benefit) as a result of the agreement reached with him/her in any form, in any organization that is a competitor, client, partner, consultant, investor of TransContainer, except for:

holding shares in a public joint stock company not exceeding five (5) per cent of the total number of voting shares in such public company which does not ensure right to exert significant influence on the management of and/or decision-making process in such company

holding bonds in a public joint stock company without a right to exert significant influence on the management of and/or decision-making process in such company.

6.7.5. The activities of the family members (spouse, children, including adopted children, siblings, parents and adoptive parents) of an employee of TransContainer carried out in the companies that are deemed a competitor, client, partner, consultant, investor of TransContainer.

TransContainer proceeds from the fact that activities of the employee's family members in the companies that are deemed a competitor, client, partner, consultant, investor of TransContainer may negatively affect the impartiality of each of them when making decisions in the interests of TransContainer.

6.7.6. Personal relationships of TransContainer's employees with employees or representatives of companies that are deemed competitors, clients, business partners, consultants, investors of TransContainer.

TransContainer proceeds from the fact that employees may have or enter into personal relationships with employees or representatives of the companies that act as competitors, clients, partners, consultants, investors of TransContainer, and such circumstance may jeopardize independence and objectivity of TransContainer's employees when making decisions in the interests

of TransContainer.

6.8. The procedure for identification and management of conflicts of interest arising for the employees in the course of performance of their employment duties shall be established in a relevant by-law of TransContainer.

Business Gifts and Hospitality Exchange Principles.

6.9. TransContainer acknowledges that exchange of business gifts and hospitality expenses, including business hospitality, is a necessary part of doing business and a generally accepted business practice. TransContainer encourages atmosphere of honesty and transparency regarding business gifts and business hospitality expenses. However, TransContainer recognizes this area as exposed to the risk of corruption, therefore gifts and hospitality that employees may provide to other persons and organizations on behalf of TransContainer, or that employees may receive from other persons and organizations in connection with their activities at TransContainer, shall meet a set of the following criteria:

they shall be directly related to the legitimate objectives of TransContainer, for example, with presentation or completion of business projects, successful performance of contracts, or with generally recognized holidays such as Christmas and New Year, International Women’s Day, as well as memorable dates and anniversaries

they shall be reasonable

they shall not represent a hidden remuneration for a service, action, omission, connivance, patronage, authorization, making a certain decision, and otherwise, or an attempt to assert influence on the recipient for another illegal or unethical purpose

they shall not create reputational risks for TransContainer, employees and other persons in case of disclosure of information on the gifts

they shall not contradict the principles and requirements of the Policy, other by-laws of TransContainer and provisions of the applicable anti-corruption laws.

In the event that gifts / hospitality which employees may receive or have received from other persons and organizations in connection with their activities at TransContainer do not meet all of the above criteria, or if employees are in doubt as to whether they are allowed to accept a gift / hospitality taking into account the circumstances of their receipt or estimated value of the gift which is clearly higher than value of the gifts accepted in similar circumstances according to the customary business practices, the employees shall report such situation to their direct supervisor or to the business unit/official responsible for Corporate Fraud Management.

6.10. No gifts on behalf of TransContainer in the form of monetary funds (cash or non-cash) in any currency are allowed.

6.11. The procedure for preparation and payment of entertainment expenses in TransContainer, limits of expenses for hospitality, as well as the list of officials entitled to incur entertainment expenses, shall be specified in the by-laws of TransContainer.

Procurement Activities

6.12. When carrying out procurement activities, TransContainer shall act in compliance with the laws of the Russian Federation. The organization and procedure for procurement activities of TransContainer are governed by a relevant by-law (Procurement Regulations).

TransContainer ensures transparency when posting information on purchase of goods, work and services for the needs of TransContainer.

TransContainer shall promote unrestricted, fair competition in relation to the bidders and participants of supply of goods, works and services for the needs of TransContainer.

TransContainer shall ensure equal access to the procurement procedures for any legal entities regardless of their legal form, ownership type, location and place of capital origin, or for any individuals, including individual entrepreneurs, who meet the mandatory requirements and eligibility criteria.

TransContainer shall establish criteria for evaluation of bids of the persons willing to participate

in the tendering activities which exclude discrimination, and guarantees the unbiased procedure of selection of the bidders, determination of winners in the course of purchase of goods, work and services for the needs of TransContainer.

TransContainer shall not establish and apply any conditions and procedures restricting free competition of bidders and participants when carrying out the TransContainer's procurement activities.

Charitable Activities

6.13. TransContainer does not finance charitable and sponsorship projects in order to gain commercial advantages in connection with certain projects of TransContainer.

TransContainer's charitable activities shall be performed in accordance with the relevant by-law of TransContainer governing approval and implementation of resolutions concerning provision of charitable assistance by TransContainer.

Relationship with the Group companies

6.14. TransContainer makes sufficient efforts to ensure that the fundamental principles and requirements of the Policy are observed in the companies where TransContainer acts as a major member (shareholder). TransContainer's subsidiaries shall adopt their own anti-bribery and corporate fraud policies similar to this Policy.

Interaction with Officials

6.15. When interacting with the Officials who exercise control and supervision, the employees of TransContainer shall refrain from any illegal and unethical behavior.

6.16. TransContainer shall refrain from paying any expenses for the Officials and their close relatives (or for the benefit of such persons) in order to obtain commercial advantages in connection with certain TransContainer's projects, including cost of transportation, accommodation, meals, entertainment, advertising, or in order for such persons to get other benefits at the expense of TransContainer.

Interaction with clients, business partners and counterparties of TransContainer

6.17. When carrying out its commercial activities TransContainer adheres to the principles of ethics and mutually beneficial cooperation and declares that building business relations with third parties does not require giving gifts, providing services and organizing entertainment to/for TransContainer's employees.

6.18. TransContainer ensures implementation of due diligence in relation to the clients, business partners and counterparties in order to mitigate and suppress the risks of involvement of TransContainer's employees in corrupt practices.

TransContainer assesses its clients, business partners and counterparties for zero tolerance to corruption, including verification of implementation of their own anti-corruption procedures and policies; using official sources, carries out audit of the specified parties in terms of their good standing, affiliation to public officials (through close relatives or on other grounds related to personal interest), public authorities and state-owned organizations.

Before entering into business relations, TransContainer shall notify the clients, business partners and counterparties of the Policy principles, assess their willingness to comply with the Policy requirements, and shall include a standard anti-corruption clause in any contracts executed with such persons.

Record-keeping and accounting

6.19. Any and all financial transactions of TransContainer shall be accurately and correctly recorded in the accounting and reporting, with sufficient details, and shall be documented and available for review.

Misrepresentation or falsification of the source documents, financial transactions, accounting and reporting of TransContainer, in particular, for the purpose of implementation of TransContainer's budget, shall be strictly prohibited.

6.20. TransContainer shall appoint officials who are personally responsible for the preparation and provision of complete and accurate accounts in compliance with the due dates established by the

laws of the Russian Federation.

Provision of information to and training of employees

6.21. TransContainer shall take reasonable measures to bring to notice and explain the principles and provisions of the anticorruption laws, Policy and other by-laws of TransContainer governing Corporate Fraud Management.

6.22. TransContainer shall place the Policy and ensure that it is publicly available on the Internet (information and telecommunications network) at the following address: www.trcont.com (hereinafter referred to as the “Official Website of TransContainer”).

TransContainer shall ensure that the employees read, understand and confirm understanding of the current revisions of the Policy and other by-laws governing Corporate Fraud Management by signing, in due time, in particular when being hired.

6.23. The information may be communicated to the employees by means of newsletters, by-laws of TransContainer, reports to the target groups of managers and employees of TransContainer sent by e-mail.

Oral delivery of information to the employees, explanation of the important nature of the Policy and consultation on implementation of (compliance with) anticorruption standards and procedures shall also be carried out by the line managers and employees of the structural unit/official responsible for Corporate Fraud Management at TransContainer.

6.24. TransContainer considers it necessary to train employees in the basics of combating corporate fraud and corruption, as and when necessary, in order to form an appropriate level of anti-corruption culture and maintain awareness at a proper level. Training shall be carried out in compliance with the requirements of the laws of the Russian Federation and by-laws of TransContainer governing Corporate Fraud Management, including the Code of Conduct of PJSC TransContainer and the Policy.

6.25. For the purpose of proper creation of awareness and explanation of the Policy provisions, training of TransContainer's employees in terms of Policy requirements, as well as testing of knowledge of the anti-corruption behavior principles and rules, the Policy may be ‘redesigned’, i.e. visualized without loss of its semantic content using TransContainer corporate style elements, infographics and illustrations, and the company may also develop/ensure development of smart navigation, training sessions and tests. The visualized version of the Policy (“redesign”) shall be approved by the Management Board of TransContainer and shall be placed on the internal website of TransContainer (Intranet portal).

7. Reporting Corporate Fraud and Violations Related to the Financial and Operating Activities of TransContainer

7.1. In order to receive messages about potential cases of corporate fraud and violations connected with the financial and operating activities, TransContainer organized a Hotline via which an employee of TransContainer or any other person can report (in any convenient form) the facts of corporate fraud that have become known to him/her, including corruption, embezzlement, conflict of interest, unfair competition, violation of business ethics and other potential violations.

The Hot Line was established in order to improve the level of corporate governance, timely reveal potential cases of Corporate Fraud and other violations connected with TransContainer's financial and operating activities, and to take countermeasures.

7.2. The potential cases of Corporate Fraud may be reported by the following ways:

via the Hot Line communication channels available on the official website of TransContainer or on the internal website of TransContainer (Intranet portal), or by contacting an operator of the TransContainer Contact Center (tel. 8 (800) 100-22-20, ext. 11-01)

to the Security Department of the managerial apparatus or a structural security unit of the relevant TransContainer's branch

to the line manager or, in case such manager is suspected of corrupt practices - to any hierarchical

superior

to the President, in person or by sending a report to the following e-mail: trcont@trcont.com by other available means not contradicting the laws of the Russian Federation and TransContainer's by-laws.

7.3. TransContainer verifies the received information pursuant to the procedure provided for by the by-laws of TransContainer.

In case the fact of Corporate Fraud is confirmed, the company shall take measures aimed at elimination of the causes of violation, mitigation of effects thereof and holding liable any employees in default.

When investigating violations that have signs of corruption offences, TransContainer shall cooperate with the law-enforcement agencies with regard to combating corruption pursuant to the procedure provided for by the Russian Federation laws.

7.4. TransContainer guarantees confidentiality with respect to the employee or a third party who has reported a potential case of Corporate Fraud or violation related to the financial and operating activities of TransContainer, insofar as it corresponds to the implementation of the Policy. At the request of a whistleblower, such report may be made on an anonymous basis.

7.5. The Internal Audit Service of TransContainer shall be granted access to the information on Corporate Fraud and violations related to the financial and operating activities of TransContainer pursuant to the procedure established by the by-laws of TransContainer. The information on the most significant detected cases of Corporate Fraud involving TransContainer's employees shall be provided to the Audit Committee of the TransContainer's Board of Directors.

8. Liability

8.1. Employees of TransContainer, regardless of the position they hold, shall be responsible for compliance with the Policy.

8.2. The TransContainer shall make all possible reasonable and lawful efforts to ensure the fastest, unavoidable punishment and suppression of the facts of Corporate Fraud.

8.3. Employees of TransContainer shall be held liable for corrupt practices in accordance with the laws of the Russian Federation if their actions show signs of an administrative offense or crime.

8.4. TransContainer's employees guilty of violation of the Policy requirements may be held disciplinary liable at the initiative of TransContainer pursuant to the procedure established by the by-laws of TransContainer governing issues of disciplinary responsibility, in particular they may be held liable for:

corrupt practices if the actions of the employee do not show elements of an administrative offense or crime

failure to comply with the prohibitions established by the Policy, the Code of Conduct of PJSC TransContainer and other TransContainer's by-laws governing Corporate Fraud Management and anti-corruption activities

failure to report cases of Corporate Fraud, or suppression of such facts

failure to report a conflict of interest

employee's failure to ensure implementation of measures to combat Corporate Fraud and corruption

other actions/omissions showing signs of Corporate Fraud or contributing thereto.

9. Amendments

9.1. TransContainer shall review its policies and procedures governing Corporate Fraud Management and anti-corruption activities as and when necessary.

9.2. If the provisions of the Policy or related procedures of TransContainer are found to be insufficient, or in case of any changes to the requirements of the applicable laws, TransContainer's

management shall organize drafting and implementation of the action plan to revise and amend the Policy and/or anti-corruption procedures.
