

**APPROVED BY**

Resolution of the Board of Directors of  
PJSC TransContainer.

dated December 27, 2021, Minutes No.  
18

(Annex No. 1 to the Minutes)

Chairman of the Board of Directors

\_\_\_\_\_ S.N. Shishkarev

**Antitrust Compliance Policy  
PJSC TransContainer**

**1. General Provisions**

1.1 PJSC TransContainer (hereinafter referred to as the “Company”), being a major intermodal container operator providing freight forwarding services in the territory of the Russian Federation, and considering the possible degree of its impact both on the markets of its operations and on adjacent markets, declares its commitment to comply with the requirements of the Antitrust Laws by the Management and Employees in the exercise of their official duties.

1.2. This Policy determines the goals, objectives and basic principles of the Company in Antitrust Compliance, describes the structure of the Antitrust Compliance system and general requirements for procedures to detect, assess and prevent violations of the Antitrust Laws, manage Antitrust Risks, conduct internal investigations, as well as procedures for internal control over the functioning of the Antitrust Compliance systems.

1.3. This Policy has been developed in accordance with Federal Law No. 135-FZ dated July 26, 2006 “On Protection of Competition”, the Antitrust Compliance Guidelines of the International Chamber of Commerce and law enforcement practice in Antitrust Laws.

1.4. This Policy is an internal regulatory document of the Company and is binding on the Management and Employees of the Company.

1.5. The Company recommends applying this Policy to subsidiaries and other legal entities in which direct or indirect ownership interest of the Company amounts to 50% or less.

**2. Terms and Definitions**

**Antitrust Compliance** means a set of legal and organizational steps provided for by the Company's internal regulations and aimed at complying with the requirements of the Antitrust Laws and preventing violation thereof.

**Antitrust Laws** means the laws based on the Constitution of the Russian Federation, the Civil Code of the Russian Federation and composed of the Federal Law “On Protection of Competition”, other federal laws governing relations associated with protection of competition, including prevention and suppression of monopolistic activity and unfair competition, in which federal executive bodies, public authorities of the constituent entities of the Russian Federation, local self-governments, other organizations performing the functions of the above bodies, as well as public non-budgetary funds, the Central Bank of the Russian Federation, Russian legal entities and foreign legal entities, individuals, including individual entrepreneurs.

**Antitrust Risks** means probable adverse events in the form of restriction, elimination and prevention of competition as a result of the Company's non-compliance with the Antitrust Laws, bringing the Company to liability for offenses, economic and financial losses, failure to achieve planned performance results and damage to business

reputation of the Company. Antitrust Risks make part of the Company's corporate risk management system.

**Antitrust Compliance Manager** means an employee of the Company in charge for the functioning of Antitrust Compliance, whose competence includes organization of the functioning and continuous improvement of Antitrust Compliance of the Company.

**Antitrust Authority** means the Federal Antitrust Service of the Russian Federation and its territorial bodies.

**Antitrust Risk Owner** means the head of the structural subdivision of the Company, the owner of the business process, the strategic and operational goals of which are directly affected by this risk. The Antitrust Risk Owner is in charge for the timely detection, assessment, prevention and monitoring of the Antitrust Risk.

**External Antitrust Risk** means violations of the Antitrust Laws by third parties that affect the rights and interests of the Company.

**Public body** means federal executive bodies, public authorities of the constituent entities of the Russian Federation, local self-governments, other bodies or organizations exercising the functions of these bodies, organizations engaged in the provision of public or municipal services, as well as public non-budgetary funds, the Central Bank of the Russian Federation.

**Antitrust Compliance Report** means the primary reporting document containing information on the organization of Antitrust Compliance in the Company and on its functioning throughout the Reporting Period.

**Subsidiary** means a Russian or foreign legal entity (provided that the activities of such a foreign legal entity may affect the condition of competition in the Russian Federation), in which direct or indirect ownership interest of the Company exceeds 50%.

**Competition Protection Law** means Federal Law No. 135-FZ dated July 26, 2006 "On Protection of Competition".

**Personnel Department** means a structural subdivision of the executive office or a branch of the Company with competence that includes the issues of employment, admission and transfer of the Company's Employees.

**Antitrust Risk Map** means a document annually approved by the Management Board of the Company, containing a list of the Company's Antitrust Risks, as well as showing the probability of occurrence and the degree of impact of Antitrust Risks on the Company's business processes.

**Competitor** means a legal entity or individual carrying out activities (purchase or sale of goods, works, services) in the same commodity market as the Company does.

**Counterparty** means a legal entity or individual who intends to enter or has entered into an agreement with the Company.

**Corporate Risk Management System (CRMS) of the Company** means a set of tools that define the roles of key participants in the risk management process, the approach to identifying, assessing, reporting and managing risks, as well as the rules for sharing information and monitoring the level of risks in the Company.

**Company** means Public Joint Stock Company Center for Cargo Container Traffic TransContainer (PJSC TransContainer).

**Reporting Period** means a period of one calendar year, which commences on January 1 of each year.

**Action Plan** means a document approved on an annual basis by the Management Board of the Company that contains information on actions aimed at managing and reducing Antitrust Risks.

**Management** means President, Director, First Vice President, members of the Management Board, vice presidents (by business lines), directors of the executive office (by business lines), Chief Accountant, directors of the Company's branches.

**Employee** means an individual working under an employment contract in the Company in a position according to the staff schedule, including Antitrust Risk Owners.

**Training Sector** means a structural subdivision of the Company's executive office with competence that includes training and development of the Company's Employees.

**Internal Audit Service** means a structural subdivision of the Company established by President by decision of the Board of Directors with a view to assist the Board of Directors and executive bodies of the Company in raising efficiency of the Company's management, improving its financial and economic activities through a systematic and consistent approach to the analysis and assessment of risk management systems and internal control, as well as corporate governance as tools to ensure reasonable confidence in achieving the goals put before the Company.

**Internal Control and Risk Management Service** is a structural subdivision of the Company in charge for solving cross-process risk management tasks, methodological support and coordination at all stages of risk management.

**Subject** of Antitrust Compliance means the Management and Employees of the Company, whose labor function is associated with the emergence and realization of Antitrust Risks.

**Legal Subdivision** means a structural subdivision of the Company's executive office with competence including the issues of legal support of the Company's general business activities.

### 3. Goals, Objectives and Principles of Antitrust Compliance

3.1 The key objectives of Antitrust Compliance are as follows:

ensuring compliance of the Company's activities with the requirements of the Antitrust Laws, as well as prevention, avoidance, detection and suppression of violations of the Antitrust Laws in the Company's activities;

establishment of uniform rules and requirements for the formation of a uniform understanding of internal control among the Management and Employees aimed at compliance with the Antitrust Laws.

3.2. The tasks of Antitrust Compliance of the Company are as follows:

improving the processes of identification, assessment, prevention and management of Antimonopoly Risks;

improvement of internal mechanisms for monitoring compliance with the Antitrust Laws, as well as settlement of the consequences of realized Antitrust Risks;

ensuring that the Management and Employees are aware of the existing Antitrust Risks.

3.3. The basic principles of Antitrust Compliance are as follows:

*the principle of acknowledging* violations of the Antitrust Laws as a risk that the Company shall take into account in its activities;

*the principle of continuous and sustainable involvement* of the Management and Employees in the Antitrust Compliance process;

*the principle of resource endowment*, which provides for the allocation by the Company of the necessary material and technical resources for the implementation and operation of Antitrust Compliance;

*the principle of continuous functioning* of Antitrust Compliance, allowing for the timely identification and prevention of Antitrust Risks;

*the principle of information transparency* of implementation and operation of the Antitrust Compliance system;

*the principle of continuous improvement* of Antitrust Compliance, depending on changes in internal and external environment;

*the principle of personal responsibility* of the Management and Employees of the Company for improper implementation of the Antitrust Compliance procedures;

*the principle of regular assessment of the risks* of violation of the Antitrust Laws in the activities of the Company.

### 4. Antitrust Compliance System

#### **4.1. Regulatory Documents of the Company**

4.1.1. This Policy shall be applied in conjunction with the Articles of Association of PJSC TransContainer, the Code of Business Conduct of PJSC TransContainer, the Corporate Management Code of PJSC TransContainer, the Internal Control Policy of PJSC TransContainer, the Regulation on the Corporate Risk Management System of PJSC TransContainer, the Regulation on the Internal Audit of PJSC TransContainer and other internal documents of the Company governing business conduct, risk management and internal control, distribution of competencies, disclosure of information and compliance with the laws of the Russian Federation in the Company.

4.1.2. This Policy forms the basis for the development, as well as the relevant amendments to internal regulations of the Company that govern the processes related to the implementation and operation of the Antitrust Compliance system.

#### **4.2. Organizational Structure of the Antitrust Compliance System**

##### *4.2.1. Board of Directors of the Company:*

determines the principles and approaches to the arrangement of the risk management system, including Antitrust Risks, and internal control in the Company;

approves this Antitrust Compliance Policy;

assesses the functioning of the Antitrust Compliance as part of the assessment of the functioning of the risk management system in the Company, in particular approves the Antitrust Compliance Report.

##### *4.2.2. Management Board:*

annually approves the Antitrust Risk Map;

annually approves the Action Plan.

##### *4.2.3. President:*

exercises general control over the functioning of the Antitrust Compliance system;

appoints a person to the position of Antitrust Compliance Manager;

brings the Company's Employees to disciplinary responsibility for violations of the Antitrust Laws and the Company's internal regulations that make up the Antitrust Compliance system;

approves internal regulations that make up the Antitrust Compliance system, except for those approved by the Company's Board of Directors, as well as amendments made therein.

4.2.4. The *Internal Audit Service*, as part of assessment of the efficiency of the Company's risk management system, performs:

verification of the sufficiency and maturity of the elements of the Antitrust Compliance system;

verification of the completeness of the identification and correctness of the assessment of Antitrust Risks by the Management to the extent within the competence of the Internal Audit Service;

assessment of the efficiency of the organization and functioning of the Antitrust Compliance system, including the efficiency of the use of resources allocated for these purposes;

analysis of information on the risks realized (violations of the Antitrust Laws revealed, facts of administrative cases, court proceedings);

development of appropriate recommendations based on the results of the assessment of Antitrust Compliance.

4.2.5. The *Antitrust Compliance Manager* is the center of competence for the issues related to the implementation, functioning and improvement of Antitrust Compliance, and the person in charge for the functioning of the Antitrust Compliance system. In the performance of his duties, the Antitrust Compliance Manager reports directly to the President.

##### *Antitrust Compliance Manager:*

coordinates the process of managing Antitrust Risks and exercises control over the functioning of the Antitrust Compliance system as part of the Company's corporate risk management system with the interaction and support of the Internal Control and Risk Management Service, the Internal Audit Service, as well as other structural subdivisions of the Company;

ensures and exercises control over the organization and functioning of the Antitrust Compliance

system, including control of business processes that may lead to violation of the Antitrust Laws by the Company;

identifies Antitrust Risks in the activities of the Company, analyzes and assesses Antitrust Risks of the Company;

prepares proposals aimed at minimizing the Company's Antitrust Risks and improving the performance of the Company's Antitrust Compliance system;

arranges and controls the arrangement of processes as part of preparation by the Company's business units of analysis and monitoring of markets where the risks of violations of the Antitrust Laws exist;

arranges and controls the arrangement of processes when preparing documents and reports as part of the Antitrust Compliance system, including drafts of: Antitrust Risk Map, Action Plan, Antitrust Compliance Report, as well as the documents related to internal investigations of the activities of Employees and the Management of the Company, and other documents provided for by internal regulations of the Company that make up the Antitrust Compliance system;

maintains registers as part of the Antitrust Compliance system provided for by internal regulations of the Company;

arranges and controls the arrangement of processes as part of preparation by Employees and the Management of the Company of information and documents related to the functioning of the Antitrust Compliance system;

arranges information interaction with structural subdivisions of the Company on the issues of implementation and operation of the Antitrust Compliance system;

takes part in preparation of proposals, comments and / or in approval of draft regulatory legal acts being considered by the Company, on the issues related to the requirements of the Antitrust Laws, and on the issues related to the regulation of economic activity;

initiates preparation of draft internal regulations of the Company (draft amendments to documents) related to the Antitrust Compliance system;

exercises control over the implementation of Antitrust Compliance measures;

controls implementation of recommendations issued as a result of assessment of the efficiency of the Antitrust Compliance system;

in cooperation with the Legal Department protects the interests of the Company when considering antitrust cases against the Company, as well as cases against third parties, if the actions or inaction of such third parties affect the interests of the Company (both independently and with the engagement of other structural subdivisions of the Company and / or consultants);

advises Employees and the Management of the Company on the issues of application of the Antitrust Laws and internal regulations that make up the Antitrust Compliance system;

assists the Legal Department in analyzing the documents and actions of the Counterparties and Competitors of the Company for their compliance with the requirements of the Antitrust Laws with a view to protecting the rights and interests of the Company;

assists the Management and Employees of the Company in analyzing the documents, contracts and actions of the Management and Employees of the Company for their compliance with the requirements of the Antitrust Laws;

ensures the arrangement of the functioning of available communication channels for the Management and Employees to apply for professional assistance from the Antitrust Compliance Manager in the process of functioning of the Antitrust Compliance system;

initiates and participates in internal investigations related to the identification and establishment of the causes, conditions and methods of violation or signs of violation of the Antitrust Laws and (or) internal regulations that make up the Antitrust Compliance system;

ensures that information on violations of the provisions of the Antitrust Laws and the provisions of internal regulations that make up the Antitrust Compliance system, committed by the Management and Employees, is communicated to the Management of the Company;

develops proposals aimed at minimizing the adverse consequences for the Company as a result of violation of the Antitrust Laws by Employees or the Management of the Company;

initiates, arranges (in collaboration with the Training Sector) and takes part in training activities for Employees and the Management of the Company with a view to increasing their level of knowledge on the requirements of the Antitrust Laws applicable to the activities of the Company, as well as on the procedure of functioning of the Antitrust Compliance system;

analyzes and carries out an internal verification of information on the signs of violation by the Company of the Antitrust Laws, which comes from third parties, Employees or the Management of the Company;

upgrades own qualification on a regular basis and systematically undergoes professional retraining.

#### *4.2.6. Antitrust Risk Owners:*

ensure the compliance of activities of subdivisions under their subordination with the requirements of the Antitrust Laws;

interact with the Antitrust Compliance Manager on the application of the Antitrust Laws;

identify Antitrust Risks, as well as the signs of violation of the Antitrust Laws as part of their work in accordance with their job descriptions and internal regulatory documents of the Company;

form, together with the Antitrust Compliance Manager and the Internal Control and Risk Management Service, drafts of the Antitrust Risk Map and the Action Plan;

implement steps to manage Antitrust Risks in structural subdivisions under their subordination;

prepare reports on the implementation of the Action Plan in the prescribed manner.

#### *4.2.7. Employees:*

identify Antitrust Risks, as well as the signs of violation of the Antitrust Laws as part of their work in accordance with their job descriptions and internal regulatory documents of the Company;

take into account Antitrust Risks as part of their work;

inform the heads of structural subdivisions (Antitrust Risk Owners) and the Antitrust Compliance Manager on the risks of violation of the Antitrust Laws;

assist the Antitrust Compliance Manager in monitoring compliance with the requirements of the Antitrust Laws, in particular provide the necessary documents and information, give oral and written explanations;

take part in training on the issues of compliance of the Antitrust Laws.

#### *4.2.8. Internal control and risk management service:*

interacts with the Antitrust Compliance Manager, supports the latter in the process of managing Antitrust Risks;

in cooperation with the Antitrust Compliance Manager and the Antitrust Risk Owners, forms proposals for amending the Antitrust Risk Map;

generates proposals for amending the Action Plan.

### **4.3. Identification and Assessment of Antitrust Risks**

4.3.1. The Antitrust Risk Management system makes part of the Company's corporate risk management system.

The Company regularly identifies and assesses Antitrust Risks associated with all significant aspects of the Company's activities, assesses the degree of their impact on the implementation of business processes and the achievement of the Company's strategic and operational goals.

4.3.2. Identification and assessment of the risks of violation of the Antitrust Laws make an integral part of the Company's internal control over the Company's compliance with the Antitrust Laws.

4.3.3. Antitrust Risks are identified and assessed in accordance with the Policy of the Corporate Risk Management System of PJSC TransContainer, as well as the rules of identification and assessment of risks approved by the Company, including the Methodology of Identification and Assessment of Antitrust Risks in the activities of PJSC TransContainer, enshrining the methodology

of assessment of Antitrust Risks, as well as the procedure and terms of compiling the Antitrust Risk Map.

4.3.4. Antitrust Risks are identified by the Antitrust Compliance Manager, Employees and the Management in the Company's business lines related to Antitrust Risks.

4.3.5. with a view to identifying Antitrust Risks, the Antitrust Compliance Manager arranges:

a) analysis of revealed violations of the Antitrust Laws in the activities of the Company and the results of official investigations into the facts of violation of the Antitrust Laws;

b) analysis of internal regulations of the Company with a view to identifying the signs of violation of the Antitrust Laws;

c) analysis of draft internal regulations of the Company;

d) monitoring of the Antitrust Laws and analysis of the practice of application of the Antitrust Laws;

e) analysis of the efficiency of the developed and implemented steps to reduce Antitrust Risks.

4.3.6. Antitrust Risks are assessed by the Antitrust Compliance Manager, considering the information and data provided by Employees and the Management of the Company.

4.3.7. Antitrust Risks identified during the reporting period and the results of their assessment are recorded in the Antitrust Risk Map approved in the manner and within the time frames set by the Methodology of Identification and Assessment of Antitrust Risks in the Activities of PJSC TransContainer.

4.3.8. The current version of the approved Antitrust Risk Map shall be posted on the Company's internal website (Intranet portal).

4.3.9. Information on the results of identification and assessment of Antitrust Risks is also included in the Antitrust Compliance Report.

#### **4.4. Steps Aimed at Reducing Antitrust Risks**

4.4.1. Based on the results of assessment of Antitrust Risks, the Company takes steps to manage such Antitrust Risks as part of existing business processes by way of implementing the relevant regulations and procedures.

4.4.2. Steps to manage Antitrust Risks are implemented at the strategic (corporate) and operational (process) levels. Steps are developed considering the balance between achieving the goals and strategic objectives of the Company and complying with the requirements of the Antitrust Laws. The choice of the intensity of steps to manage Antitrust Risks is made considering the category of criticality of the respective Antitrust Risk.

4.4.3. Steps (measures) to reduce Antitrust Risks may include regulation of business processes, development of standard forms of documents, analysis of draft contracts and internal executive documents for compliance with the Antitrust Laws, introduction of internal conciliation procedures, provision of explanations to the Management and Employees within their competence on application of the Antitrust Laws and functioning of the Antitrust Compliance system, approval of the procedure for the Management and Employees to act in case of revealing signs of violation of the Antitrust Laws, management of knowledge of Employees and the Management (in particular, conducting initial and repeated training events), incentives for Employees and other steps.

4.4.4. Steps (measures) to mitigate Antitrust Risks are developed by the Antitrust Compliance Manager jointly with the Antitrust Risk Owners and the Internal Control and Risk Management Service on an annual basis and are included in the Action Plan.

4.4.5. The Action Plan shall contain:

a) the name of the steps aimed at managing Antitrust Risks, including a description of the actions of Employees and the Management aimed at implementing such measures;

b) an indication of the person in charge for the fulfillment of a specific step (which may include, among other things, the Antitrust Risk Owner within its competence, the Antitrust Compliance

Manager or other persons);

- c) deadline for the measure;
- d) performance indicators of the measure.

4.4.6. For the purposes of preparing the Action Plan, the Internal Control and Risk Management Service and the Antitrust Risk Owners by their areas of competence form proposals for the inclusion of measures in the Action Plan for the next reporting period and send the same to the Antitrust Compliance Manager no later than 15 business days from the date of the end of the Reporting period.

For the purposes of forming the Action Plan, the Internal Audit Service develops recommendations based on the results of assessment of the performance of Antitrust Compliance.

4.4.7. Proposals and recommendations may contain new measures not previously included in the Action Plan, as well as proposals and recommendations for the extension, modification and (or) exclusion of measures from the Action Plan contained in the Action Plan for the ended Reporting Period.

4.4.8. Based on the proposals and recommendations received, the Antitrust Compliance Manager draws up a draft Action Plan for the next Reporting Period and supplements it with own proposals.

4.4.9. The Antitrust Compliance Manager sends to the Management Board of the Company a draft Action Plan attaching the Antitrust Compliance Performance Report no later than 35 business days from the end of the Reporting Period (except as provided for in clause 4.8 of the Methodology for Assessing Effectiveness of Organization and Operation of Antitrust Compliance System of PJSC TransContainer) for approval.

4.4.10. The Action Plan is approved by the Management Board of the Company annually at the next meeting from the date of submission of the draft Action Plan by the Antitrust Compliance Manager.

4.4.11. Information on the implementation of measures to reduce and manage Antitrust Risks contained in the Action Plan (including information on the fact that in the Reporting period the Subjects of Antitrust Compliance have been familiarized with internal regulations that make up the Antitrust Compliance system and have been trained on topics related to the Antitrust Laws and Antitrust Compliance) is included in the Antitrust Compliance Report.

4.4.12. The current version of the approved Action Plan shall be posted on the Company's Intranet portal after the Board of Directors approves the Antitrust Compliance Report in accordance with clause 4.10.6 of this Policy.

4.4.13. The Antitrust Compliance Manager monitors the implementation by Employees and the Management of the measures to reduce and manage Antitrust Risks contained in the Action Plan.

4.4.14. Upon identification or establishment in the actions of the Company, its Employees or Management of violation or signs of violation of the Antitrust Laws, the Antitrust Compliance Manager shall develop and take timely steps, considering the circumstances of violation, aimed at:

termination of established violations of the Antitrust Laws or signs thereof (if violation has not been finished);

elimination of causes of violation (or signs of violation) of the Antitrust Laws;

minimization of adverse consequences resulting from violation of the Antitrust Laws (if any).

## **4.5. Information, Communication and Training**

4.5.1 The Company disseminates information on the implementation and operation of the Antitrust Compliance system using the official website of the Company in the Internet at [www.trcont.com](http://www.trcont.com), the Company's intranet portal, sending relevant materials to business email addresses, arranging training on the issues of Antitrust Compliance, in particular with the engagement of external legal consultants, conducting testing and otherwise.

4.5.2 Information on the primary prohibitions and restrictions of the Antitrust Laws, on liability for violation of the Antitrust Laws, as well as the rules for Employees to comply with the Antitrust

Laws and internal regulations that make up the Antitrust Compliance system, as part of the performance of their duties, including when interacting with Counterparties, Competitors and Public Bodies, shall be posted on the Intranet portal of the Company.

4.5.3 Subjects of Antitrust Compliance are required to familiarize with internal regulations that make up the Antitrust Compliance system.

4.5.4. The procedure of functional interaction and communications between the Subjects of Antitrust Compliance in the course of training and familiarization of Employees and the Management of the Company with internal regulations that make up the Antitrust Compliance system and the requirements of the Antitrust Laws is governed by internal regulations of the Company, including the Regulation on Familiarization of Employees of PJSC TransContainer with Regulatory Documents and Training in Antitrust Compliance Requirements.

4.5.5. The Management and Employees shall have the right to directly contact the Antitrust Compliance Manager to obtain the necessary advice regarding the application of the Antitrust Laws and (or) the functioning of the Antitrust Compliance system.

4.5.6. The Company on a regular basis (at least once every three years) shall conduct education and trainings on the issues of application of the Antitrust Laws for the Subjects of Antitrust Compliance.

4.5.7. The form and content of training activities on the requirements of the Antitrust Laws and on the functioning of the Antitrust Compliance system shall be determined by the Company independently.

4.5.8. The Antitrust Compliance Manager and the Training Sector shall be in charge for the timely conducting of training activities for the Subjects of Antitrust Compliance.

4.5.9. The training procedure shall be governed by internal regulations of the Company, including Regulations on Familiarization of PJSC TransContainer Employees with Regulatory Documents and Training in Antitrust Compliance Requirements.

#### **4.6. Steps Aimed at Control over the Functioning of Antitrust Compliance**

4.6.1. Control over the functioning of the Antitrust Compliance system shall be exercised by way of:

a) control by the Antitrust Compliance Manager of compliance by Employees and the Management when performing their duties with the requirements of the Antitrust Laws and internal regulations that make up the Antitrust Compliance system;

b) control by the Antitrust Compliance Manager over the fulfillment by Employees and the Management of the measures provided for by the Action Plan on time;

c) periodic (at least once a year) evaluation of the effectiveness of the organization and functioning of the Antitrust Compliance system by the Internal Audit Service in the manner set by Section 4.9 of this Policy and the Methodology for Assessing Effectiveness of Organization and Operation of Antitrust Compliance System of PJSC TransContainer;

d) approval by the Company's Board of Directors of the annual Antitrust Compliance Report containing information on the functioning of the Antitrust Compliance system for the Reporting Period.

4.6.2. Upon revealing any shortcomings in internal regulations that make up the Antitrust Compliance system or ineffective functioning of the Antitrust Compliance system, the Antitrust Compliance Manager shall initiate amendments to these internal regulations that make up the Antitrust Compliance system and (or) develop measures aimed at improving the performance of the Antitrust Compliance system and minimizing/preventing adverse consequences that occurred/are possible as a result of deficiencies identified.

4.6.3. information on violations of the Antitrust Laws identified by the Company and identified deficiencies in internal regulations that make up the Antitrust Compliance system shall be included in

the Antitrust Compliance Report.

#### **4.7. Reports of Violations of the Antitrust Legislation and Internal Regulations on Antitrust Compliance**

4.7.1. The Company shall immediately respond to all facts and signs of violation of the Antitrust Laws or internal regulations that make up the Antitrust Compliance system in the Company's activities and prevents and minimizes possible adverse consequences for competition caused by such violations.

4.7.2. The Management and Employees, Counterparties and Competitors, as well as any other person concerned are provided with an opportunity to confidentially report possible violations of the Antitrust Laws by phone numbers 8 (800) 100-22-20 (for regions), +7 (495) 788-17-17 (for Moscow and Moscow Region), indicated on the official website of the Company, or by e-mail to [trcont@trcont.com](mailto:trcont@trcont.com).

4.7.3. The Management and Employees of the Company shall have the right to confidentially report violations (or signs of violations) of internal regulations that make up the Antitrust Compliance system, or on non-compliance of such internal regulations that make up the Antitrust Compliance system with the applicable Antitrust Laws in any way available to them (in particular by sending an official note or e-mail messages to the corporate address of the Antitrust Compliance Manager, as well as by the means referred to in clause 4.7.2 of this Policy).

4.7.4. The Company welcomes and encourages information from any parties concerned, including those other than Employees, on the facts of violation of the Antitrust Laws by the Company that became known to them, as well as on the facts of violation of internal regulations that make up the Antitrust Compliance system by Employees or the Management of the Company.

#### **4.8. Responsibility and Internal Investigations**

4.8.1. Upon establishment of violations of the Antitrust Laws, the Company, Employees and the Management may be brought to criminal, civil and administrative responsibility under the laws of the Russian Federation.

4.8.2. Employees and the Management who have violated the requirements of the Company's internal regulations that make up the Antitrust Compliance system and (or) the requirements of the Antitrust Laws may be subject to disciplinary responsibility in the manner set by labor and employment laws.

4.8.3. On the facts of violation of the Antitrust Laws, an internal investigation procedure shall be initiated in the manner and within the time frames set by the Regulation on the Procedure of Internal Investigations of Illegal Actions Related to Violation of the Antitrust Laws.

#### **4.9. Performance Evaluation of the Antitrust Compliance System**

4.9.1. Evaluation of the efficiency of the implementation of the Antitrust Compliance measures, as well as the efficiency of the organization and functioning of the Company's Antitrust Compliance system shall be conducted periodically (but at least once a year) by the Internal Audit Service in the manner set by the Company's internal regulations, including the Methodology for Assessing Effectiveness of Organization and Operation of Antitrust Compliance System of PJSC TransContainer.

4.9.2. Where necessary and by decision of the Company's Board of Directors, an independent antitrust audit of the Company's processes, as well as of the efficiency of organization and functioning of the Antitrust Compliance system, with the engagement of external consultants in the manner set by the Company's internal regulations, can be conducted.

4.9.3. Information on the achievement of performance indicators for the organization and functioning of the Antitrust Compliance system, as well as on measures aimed at improving the efficiency of the organization and functioning of the Antitrust Compliance system, shall be included

in the Antitrust Compliance Report.

#### **4.10. Antitrust Compliance Report**

4.10.1. The Antitrust Compliance Report is the main reporting document of the Company's Antitrust Compliance and is separate from internal regulations that make up the Antitrust Compliance system.

4.10.2. The Antitrust Compliance Report shall include the following information:

a) on the results of assessment of the risks of violation of the requirements of the Antitrust Laws for the Reporting Period;

b) on the achievement of performance indicators of Antitrust Compliance for the Reporting Period;

c) on measures aimed at improving the efficiency of the organization and functioning of the Antitrust Compliance system for the next Reporting Period;

d) on internal investigations conducted by the Company for the reporting period and on the response measures taken;

e) on the implementation of measures to mitigate and manage Antitrust Risks contained in the Action Plan (including information on familiarization with internal regulations that make up the Antitrust Compliance system and training on topics related to the Antitrust Laws and Antitrust Compliance during the Reporting Period) for the Reporting Period;

(f) on violations of the Antitrust Laws identified by the Antitrust Authority and (or) the Company, as well as on identified internal Antitrust Risks not included in the Antitrust Risk Map for the Reporting Period;

(g) on violations of the Antitrust Laws identified by the Company and identified deficiencies in internal regulations that make up the Antitrust Compliance system for the Reporting Period.

4.10.3. At the discretion of the Antitrust Compliance Manager, the Antitrust Compliance Report may include other significant information on the functioning of the Antitrust Compliance system for the Reporting Period.

4.10.4. The draft Antitrust Compliance Report shall be prepared by the Antitrust Compliance Manager on the basis of information contained in the registers and reports provided for by internal regulations that make up the Antitrust Compliance system, as well as on the basis of its own results obtained as part of control over the functioning of the Antitrust Compliance system.

4.10.5. The Report on Antitrust Compliance with the attached Report on Performance Indicators of Antitrust Compliance shall be submitted by the Antitrust Compliance Manager for approval by the Board of Directors annually no later than 35 working days from the date of the end of the Reporting Period (except for the cases provided for in clause 4.8 Methodology for Assessing Effectiveness of Organization and Operation of Antitrust Compliance System of PJSC TransContainer).

4.10.6. The Antitrust Compliance Report is subject to approval by the Company's Board of Directors annually at the next meeting from the date of submission of the draft Antitrust Compliance Report by the Antitrust Compliance Manager.

4.10.7. The Antitrust Compliance Report approved may be posted on the Company's Intranet portal by decision of the Company's Board of Directors.

4.10.8. The Antitrust Compliance Report approved accompanied with the Report on Antitrust Compliance Performance Indicators may be sent to the Company's shareholders.

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